



THE CENTER FOR FOOD SAFETY

US Department of Agriculture Marketing Service Hearing: Proposed National Leafy Green Marketing Agreement

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The Center for Food Safety (CFS) would like to thank the USDA Agriculture Marketing Service for this opportunity to speak on a proposed marketing agreement to cover the handling of leafy green vegetables and products in the U.S.

CFS is a non-profit, environmental and consumer advocacy organization that works to protect human health and the environment by curbing the proliferation of harmful food production technologies and by promoting organic and other forms of sustainable agriculture. Our constituency is comprised of people across the country who actively engage in public policy debates on organic agriculture, sustainable food production technologies, and food safety. They support organic agriculture in their communities by consuming organic food from farmers' markets, grocery stores, as shareholders in Community Supported Agriculture (CSA) farms and, increasingly, by growing their own food and promoting organic food purchases in schools and other local institutions.

CFS is here today to express its strong reservations about the establishment of a National Leafy Green Marketing Agreement (NLGMA) as a means to address growing food safety concerns in the U.S. We do not believe that the marketing arm of USDA is the appropriate institutional home within government for developing and enforcing food safety standards. According to the AMS website, its role is to "administer[s] programs that facilitate the efficient, fair marketing of U.S. agricultural products," and to "assist in the orderly marketing and distribution of farm commodities." No where is food safety mentioned as a part of its mission or mandate. Moreover, AMS staff are economic and marketing specialists, not trained in matters of food safety. Since food safety is a public health issue and not a marketing issue, we believe that the authority to regulate and oversee food safety should rest with the U.S. Food and Drug Administration (FDA) in coordination with the U.S. Department of Agriculture (USDA).

Adopting the proposed NLGMA is also beyond the scope of the Agriculture Marketing Agreement Act of 1937 (AMAA). The law authorizes AMS to create marketing orders in order to "establish and maintain such orderly marketing conditions for agriculture commodities in interstate commerce," and to create price parity and stability in the marketplace. The AMAA authorizes the adoption of policies to regulate market prices and to facilitate the sale of U.S. farm products. The