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Testimony of David Runsten, Director of Policy and Programs, Community Alliance with Family Farmers, Davis, California, at the USDA hearing on the proposed National Leafy Green Marketing Agreement, Monterey, California

The Community Alliance with Family Farmers (CAFF) is a California non-profit membership organization composed of family farmers and other citizens that promotes family farming, sustainability, and local food systems. CAFF counts as members approximately 1,000 family farmers in California.

Impact on Diverse Farms

CAFF does not agree with the approach of the produce industry that food safety should be dealt with on a crop specific basis. This proposed National Leafy Green Marketing Agreement (NLGMA) starts us down the road of one set of rules for greens, another for melons, another for tomatoes, and so on, all overseen by different groups making their own rules and determinations of risk. Our members include dozens of farmers who grow leafy greens, melons, tomatoes, and other crops on their farms. Some of the more diversified farms that supply Community Supported Agriculture (CSA) networks with weekly boxes grow as many as 100 different crops in the course of a year. Any such farm that is not quite small will also sell wholesale and so potentially become subject to multiple rules and auditing requirements—possibly contradictory—promulgated by agreements like this one, creating an unfair burden on such farms. This would be particularly burdensome for small farms that include animal production or that try to integrate farming practices with protective environmental or ecological practices, due to the biases against such practices that have developed among food safety professionals and their metrics. Furthermore, many of the small vegetable growers in California are immigrants and minorities who often market to their own communities but who also want to sell to wholesale markets. Asian immigrants in the Central Valley growing for the San Francisco and Los Angeles Asian markets are an example. Creating onerous and costly requirements is the wrong way to help them succeed as farmers or to ensure the safety of their food.¹

Focus on Fresh-Cut

CAFF has always supported an effort to develop a set of basic food safety practices—such as monitoring prior land use and activities on adjacent land, periodically testing water sources, or having farm workers wash their hands after using the toilet—that would be applicable to all farms growing produce. We believe that specialized rules to control risks for special markets—such as the fresh-cut processing industry—should be confined to farms producing for those markets. In reading this proposal for a National LGMA it is apparent that it is written to serve the

¹ Shermain Hardesty from UC Davis will offer testimony on the costs of compliance with CA LGMA.