

**2009-2011 Fruit and Vegetable Industry Advisory Committee**  
**Meeting Date: February 28-March 1, 2011**  
**Detailed Recommendations with Summaries**

**I. KYF<sup>2</sup>**

***Overview***

The goal is to ensure the success of the Know Your Farmer, Know Your Food (KYF<sup>2</sup>) initiative. The Committee recognizes USDA's ultimate goal is to encourage Americans to include more fruits and vegetables in their diet, purchasing their produce from safe food sources of all types. In providing this guidance, the USDA also supports a nationwide discussion about the importance of understanding where your food comes from and how it gets to your plate.

The Committee asks the Secretary to consider revising some of the program's website entries to ensure that the USDA does not unintentionally imply that locally grown fruits and vegetables are healthier, more nutritious, and safer than non-local production, or give consumers the impression that the Department favors one type of farmer or production over another. With the doubling of the world food demand by 2030 we will need all forms of production to ensure consumers enjoy a year round supply of healthy fruits and vegetables.

***Recommendations:***

- 1. *Regarding the KYF<sup>2</sup> website Mission Statement:*** The text in the mission statement reads...“there is too much distance between the average American and their farmer and we are marshalling resources from across USDA to help create the link between local production and local consumption.” Such language may give consumers the impression that the USDA is making value judgments on non-local producers who are often responsible for ensuring that consumers enjoy a year round supply of healthy fruits and vegetables. Further, a push for local production does not result in overall economic growth for all farmers, it only redistributes opportunities. Asking consumers to chose local over other forms of production places the USDA in the position of creating “favored” farmers over “disfavored” farmers and may unintentionally decrease consumption when local produce is not available. There is only economic opportunity for farmers and health benefits for consumers, if the Department pairs the “Know Your Farmer” message with an aggressive campaign to increase consumption of fruits and vegetables – regardless of where the fruits and vegetables were grown.
- 2. *Regarding the Support Your Local Farmer Section:*** The text in this section discounts the fact that many foods, including fruits and vegetables, may not always be accessible through local production. More importantly, it seems to discount that all fruits and vegetables are grown by farmers with the same intent – to offer consumers safe and healthy products.
- 3.** The USDA should add a consumer advice section to help consumers ensure that the food bought from farmers markets is in fact locally *AND* safely produced. Local production does not guarantee food safety. In the case of fruits and vegetables, failure to comply with generally acceptable food safety standards may actually restrict local producers' access to the marketplace as many retailers and foodservice operators require such standards.

4. A section such as, *What You Need to Know About Food Safety*, should also be added to the *Farmers Markets* section to provide guidance to local producers on generally accepted food safety standards.
5. While consumers should be encouraged to ask about the origin of their food, the text in the *Healthy Living* section should be modified to ensure that the USDA does not leave consumers with the impression that only locally produced food is healthy.

## **II. Purchasing**

### ***Recommendations:***

1. The USDA's SNAP and WIC purchases should be measured and analyzed so expenditures can be identified by product category. The Committee understands that USDA currently has an initiative to undertake such an analysis and we support the Agency's direction. Once expenditures by product category are identified, the Department should set goals to ensure that expenditures for the different product categories are aligned with the recommended dietary guidelines. WIC fruit and vegetable voucher monetary value amounts need to be sufficient for mothers to ensure that half their plate is comprised of fruits and vegetables.
2. The Committee supports the Healthy Incentives Pilot (HIP). The Committee would like to receive periodic reports on the progress, results, and public relations efforts for this program over the next two years. The Department should continue to fund programs like the HIP to study the factors that prevent or distract consumers from using their food nutrition assistance dollars on fruits and vegetables.

## **III. Food Safety\***

***\*Disclaimer: These recommendations from the Advisory Committee result from discussions held within the full Committee after short presentations and brief question and answer sessions with representatives of the FDA, CDC and USDA. The accuracy of the content has not been confirmed by any of the three Agencies with certain elements regarding the MDP in particular disputed by the USDA.***

### ***Overview***

***Pathogen Testing and Surveillance:*** The produce supply chain is subject to multiple layers of product testing and surveillance for pathogens of concern to the public health. These tests are conducted by State and Local agencies, the FDA at points of entry and retail establishments, and the USDA via the MDP.

Often, these tests are a duplication of expenses among the agencies since the testing is not a coordinated effort. The test results are not shared between the participants rendering the test results unless relevant in establishing baseline trends, or giving visibility to multi-geographical events. Sampling processes by the FDA at the port of entry routinely delay product movement within the supply chain impacting the ultimate taste and freshness of the produce to the consumer. Last, but not least, these test programs increase the burden on the supply chain with little apparent benefit in product safety being realized.

*USDA MDP Program:* In Fiscal Year 2001, the USDA was charged with implementing a monitoring program to collect information regarding the incidence, number, and species of important foodborne pathogens and indicator organisms on domestic and imported fresh fruits and vegetables. USDA's Agricultural Marketing Service (AMS) was appointed to undertake the creation and implementation of such a program, currently known as the MDP. MDP began collecting and analyzing samples in April 2001.

*Mechanics:*

- State officials under contract to the USDA take 3-6 samples from a single lot at a distribution center location.
- The sample is tested for pathogens of concern. If any product tests positive, the test result is forwarded to the FDA.
- In practice, the source farm is contacted by FDA, and without apparent investigation, requests that all related products are recalled.
- Typically by the time the farm source has been notified, the product has passed shelf life limits and is no longer in commerce. In this instance, the benefits in protecting the public health resulting from the recall are highly questionable.

*Industry concerns with MDP:*

- At the time of sampling, product is not in the custody or control of the grower and may have been mishandled after leaving the grower. Yet, the grower is the subject of the recall action simply based upon a positive test result.
- A single positive test result does not provide a “reasonable probability” that produce from the entire farm source is unsafe.
- During the last three years products recalled due to a single positive test result have not been associated with any foodborne illness or outbreak.
- Unnecessary product recalls that do not contribute to the protection of public health undermine consumer confidence in the safety of the produce supply chain, discourages consumption of produce that is an important part of a healthy lifestyle and diet and damages the reputation of the farmers growing the product along with financial injury.

***Recommendations:***

1. The Secretary should review with the USDA the establishment of a centralized database to collect and warehouse test results for agricultural products being generated by multiple jurisdictions including the USDA, FDA, CDC and various State and local officials. The USDA would make the database available to any authorized agency in the event of a foodborne illness outbreak to assist authorities in the investigation and prompt resolution of the outbreak. The USDA would conduct an annual review of the data received in the central database and correlate any findings with outbreaks of foodborne illness to aid in the assessment of the risk to the public health associated with fresh produce consumption.

2. The Secretary should commission an independent study to correlate the data collected by the USDA through the MDP with foodborne illness data collected by the CDC to determine if the historical data collected over the past ten years indicates there is a “reasonable probability” of risk to the public health resulting from a single positive test obtained through MDP sampling. It is recommended that the USDA cease using the MDP sampling activity as an enforcement tool

for which it was not scientifically designed and have the Secretary evaluate the on-going benefits of continuing the MDP as it is currently designed such as:

- a) Has the initial mandate for the program been achieved?
- b) What will we learn the next ten years that we have not learned during the past ten years?
- c) Are the funds necessary to execute the MDP better utilized elsewhere?

#### **IV. Agricultural Labor**

##### ***Overview***

The Committee reviewed the issue of the off-shoring of U.S. fruits and vegetables. Market demand for fruits and vegetables is increasing domestically and the amount of imported fruits and vegetables that Americans consume is rising daily. States that have large agricultural sectors have been economically out-performing those states without much agriculture during the recent economic downturn. In order for U.S. fruit and vegetable producers to stay in business and bolster the overall economy, the farms must be able to be competitive against imported fruits and vegetables. The three points listed below are critical areas that need to be addressed if the U.S. desires to produce globally competitive fruits and vegetables.

##### ***Recommendations:***

1. U.S. fruit and vegetable farmers must have a reliable labor source, which is the most crucial issue. Without a guarantee of dependable and affordable labor at harvest time, farmers won't risk planting a crop which they might not be able to harvest. The most labor intensive crops generally garner the most revenue per acre; one acre of cucumbers has a much larger economic impact than an acre of wheat.
2. U.S. fruit and vegetable farmers must have a level playing field when it comes to food safety. Foreign producers must be held accountable to the same food safety standards as U.S. fruit and vegetable operations.
3. Additionally, there must be a level playing field for U.S. producers with regard to:
  - trade restrictions, including tariffs and subsidies
  - pesticide usage
  - worker safety requirements
  - minimum residue limits
  - phyto-sanitary requirements

Foreign countries shouldn't be allowed to restrict U.S. products without valid, science-based reasons. Likewise, the U.S. shouldn't allow products to come to the U.S. that may be harboring exotic pests.