



Florida Certified Organic Growers & Consumers, Inc.
P.O. Box 12311 Gainesville, FL 32604
352-377-6345 phone, 352-377-8363 fax
fog@foginfo.org
www.foginfo.org

Food Safety Update
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With the relatively recent Salmonella and E. coli outbreaks, Congress is stepping up and the administration has signaled their interest to protect the American people. There are various bills on the floor addressing food safety. Proposals vary from creation of a separate agency consolidating all food safety functions to requiring NAIS livestock tracking to mandating electronic record keeping.

FOG's goal is to make the voice of small and organic farmers heard. Following are some of the biggest policy issues these bills present to smaller scale and organic producers:

- Risk Appropriate

Regulations should take into consideration the differences in risk between large, industrial production and small, typically local, production. Consumers of products from large producers are inherently greater in number and cover a greater geographic area than consumers of products from smaller producers. With this comes a greater challenge in tracing the product from production to distribution to consumer.

- Science Based

Funding and initiatives for research of food safety threats should be emphasized. While enforcement and penalties are important and necessary, the focus should be on prevention. Research grants should include a threshold qualification that any research will address environmental, economic and social factors. Integration of these three is imperative to building a healthy, safe and sustainable food system.

- Scale Appropriate

The outcome of any bill passed should provide scale-appropriate options for registration, compliance and enforcement. This is not to say exemptions from regulations should be provided. However, a non-scaled penalty fine (one bill proposing a \$500,000 fine) may have little effect on a large producer while putting a small producer out of business. This result is not risk appropriate nor is it effectively encouraging prevention. Another example involves NAIS tracking requirements for livestock. Perhaps with thousands of acres and thousands of animals, electronic tracking is the best option available. However, the investment in the technology does not make sense, nor is it typically economically feasible or appropriate, for smaller scale producers with a few acres and a couple cows, some chickens or a few pigs.

- Region/Crop Specific

A limitation to the potential of purely federal food safety oversight is that regulations would have to be broad enough to encompass the differing needs and risks across the country. The contaminants, pests, etc. for a crop in Oregon are not the same as a crop in Florida. If broad, national compliance requirements are imposed, it would not only be inefficient but could also cause regional threats to be overlooked.

- Organic/Sustainable Agriculture Supported

Potential regulations could contradict already-established regulations in the National Organic Program as part of the 2008 Farm Bill. Food safety regulations should not preclude organic, sustainable or alternative agriculture. In the interests of environmental/energy conservation, economic growth and human safety, conversations between industrial and alternative agriculture should be encouraged and the benefits and/or issues of both considered in research, incentives, funding and especially legislation.

- Proactive, Integrated (not reactive) Initiatives

There are already seemingly knee-jerk reactions to food safety resulting in loss of wildlife habitat, biodiversity and healthy ecosystems. Some science-based conservation practices, supported by other agencies, are being decimated by recent quick-fix safety measures, such as “buffer zones” around produce crops that have destroyed valuable conservation land. Further, there is a threat to integrated farming systems. The benefits of a systems approach to agriculture are well known and finally starting to get the public and governmental attention they deserve. To render these practices illegal would be a step back in our progress toward a healthy, sustainable and safe food system.

- Farmer in the Middle

The push for scale and risk appropriate food safety measures may ultimately have the largest positive effect on the mid-scale farmers. As organic products gain consumer demand, mid-scale organic producers face difficulties in maintaining market access. Varying certification and distribution demands create obstacles that mid-size outfits don't have the resources to overcome. They are stuck with too much product for a CSA or farmer's market, but not enough to supply a grocery store chain. Education and regulations that are scale appropriate can lead to greater consumer confidence and open market access for all producers. Current initiatives, like farm-to-school or local food sourcing for institutions, would have greater success and greater beneficial impact on the balance between environmental, economic and social concerns.

FOG's purpose is to encourage organic production and ensure that small farmers are granted the rights, respect and protection they deserve as citizens, as business-owners and as providers of the most important commodity—food. With this mission in mind, following are some actions FOG has taken and will continue to pursue:

- FOG has been involved in community and industry discussions on food safety since the issue developed.
- FOG has increased staff attention to food safety concerns and education.
- FOG has met with organic farmers and organic organizations to address concerns and develop a position on food safety issues.
- FOG has met with Congresswoman DeLauro and her senior staff, signaling our strong desire to be involved in the food safety discussion.
- FOG is a member of the National Sustainable Agriculture Coalition, involved with food safety committees to monitor and develop legislation policy standpoints.
- FOG is a member of the Organic Trade Association and represented on a food safety task force, creating recommendations for organic farmers and the organic industry.
- FOG is a member of the Leafy Greens Working Group, composed predominately of organic farmers and organizations, which has been addressing the subject for over six months.

- FOG will continue to raise our concerns, review bills as they hit the floor and continue to speak as regulations are developed.
- FOG looks forward to continuing our participation towards human health, agricultural viability and environmental responsibility.

We invite any and all comments, suggestions and concerns from growers, producers and consumers. Please let us know how we can include your voice as we strive for fair and effective food safety measures.

Sincerely,

Marty Mesh, Executive Director

Florida Organic Growers and Consumers, Inc.