Farmers and Conservationists for Sensible Food Safety

FOOD SAFETY ACTION SHEET

Without Your Input, food safety regulations being drafted could put an undue burden on small farmers, threaten the existence of intact habitat and conservation plantings for water quality and biodiversity, make it harder to farm organically, and not fully address the problem. Agricultural food safety is on a fast track with multiple levels of industry and government involved.

WHAT YOU NEED TO KNOW

Food safety concerns over *E. coli* 0157:H7 bacteria are at an all-time high. Since the unfortunate spinach incident last fall, grocery store food chains are demanding a safer food supply, and some regulatory agencies are encouraging industry to proactively address the issue.

A food safety leafy-green marketing agreement and order is being drafted. The industry (represented principally by Western Growers Association) with the CA Dept. of Food and Ag. (CDFA) as the implementing agency, is drafting standards in order to gain market shares back. CDFA has held a hearing to receive comment on the marketing agreement; there has not yet been a formal opportunity for comment on the marketing order or on the Good Agricultural Practices (GAPs) upon which the marketing agreement and order will rely. [1]

Farm food safety protocol is becoming a national issue. State and federal government legislators are discussing the creation of bills that would require food safety measures to be taken.

Other crops besides leafy greens may become affected. Food safety recommendations are being made for almonds and possibly other crops, without careful consideration of multiple farm and conservation issues.

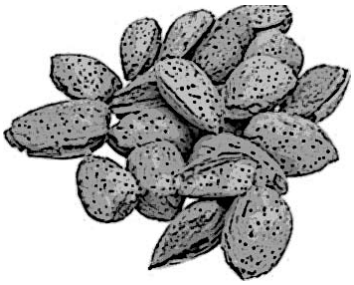
***E. coli* 0157 is in some areas of the environment.** A major source is grain-fed cattle with unnaturally acidic stomachs. [2] Other sources include applications of animal-based fertilizers, and rarely some wildlife. During the rainy season, *E.coli* 0157 can travel through a watershed and survive up to 6 months or more.

Natural processes help break down pathogens when allowed to occur. Vegetation along drainage ditches and in riparian areas filters out sediment and pathogens, prevents soil erosion, and improves water quality.[3] Diverse microorganisms in the soil help with decomposition of *E. coli* 0157 bacteria.

Proposed GAPs may do more harm than good. Some of the draft leafy green metrics are in direct conflict with efforts by farmers, State and Federal government agencies, and non-governmental organizations to increase conservation plantings on farms. Scientific research demonstrates that diversity of the landscape leads to healthy farms and a healthy food supply, and has shown a minimal risk from wildlife associated with habitat. More research is being conducted to learn about these relationships. [3]

WHAT YOU CAN DO

- Sign-up on an email sheet at Community Alliance with Family Farmers booth in the Marketplace Tent, or at the Wild Farm Alliance table in the back of Chapel to stay in contact.
- Submit comments to the leafy green marketing order once it is posted by CDFA. [1]
- Contact the Almond Board and express your concern about the importance of biodiversity and habitat which supports beneficial insects.
- Contact your state and federal representatives to voice your concerns for sensible food safety regulations.



A 20-foot dead zone between crops and habitat is suggested by the draft leafy green GAPs and is an incentive to remove habitat. There is no scientific reasoning for the width of this requirement, and much to be lost by it. Studies show that habitat provides for pollinator, predatory, and parasitic insects,[4] rodent-eating predators, and other wildlife.[5] There is no science to support the belief that a sterile environment will reduce the risk of *E. coli* 0157 transport into the crop.

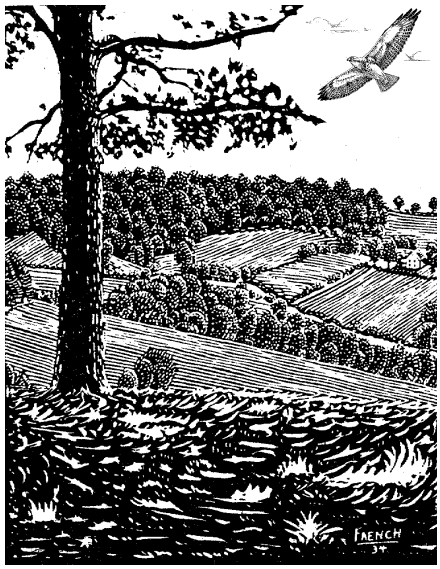
Elimination of wildlife on farms is suggested by the draft leafy green GAPs. Wildlife move through farms and the vast majority do not contaminate crops. Measures needed to eliminate any chance of animal entry to all production fields, including birds, would be impossible. It would be enormously expensive (several hundred dollars per acre) to exclude terrestrial animals. Fencing off habitat that provides food, cover and critical movement corridors for wildlife would impact the native species that have been already relegated to small areas of functioning ecosystems. The use of poison traps that results in rodents becoming laced with chemicals would harm natural vertebrate predators high on the food chain, such as hawks and owls. These raptors play an important economic role in reducing rodent populations.[6]

Compost is coming under more scrutiny in the draft leafy green GAPs. The National Organic Program requires composted materials meet defined carbon-to-nitrogen ratios, specific temperatures, and process time. The *E coli* 0157 standard in the draft GAPs may need to be reduced for finished composts and animal-based inputs, and the specified time interval between testing and incorporation of compost into the soil may not go far enough. Without better data, farmers making their own compost will have undue restrictions, and trucking costs may increase because of fewer compost suppliers.

Food crops are grown outdoors and in the soil and are expected to be occasionally contaminated. Processors of leafy greens and other vegetables for raw consumption have sophisticated washing and disinfection procedures that if carried out properly eliminate widespread contamination. A breakdown of these procedures is more than likely the cause of large outbreaks. Reducing wildlife habitat and water quality programs will not eliminate the problem. Food has always been produced from fields that are surrounded by habitat.

Small farmers will be adversely affected by the costs associated with compliance.[7] Water and soil testing, fencing, and the amount of growing ground that may have to be given up for sterile buffers will disproportionately impact small farmers. The GAPs have been written to address large farms and mechanical harvesting. While small farmers care just as deeply about food safety as large farmers, realistic requirements need to take into account the small farmer's profit margin and diverse production schedules.

Nobody knows exactly how to prevent further food safety incidents. There are many avenues for pathogens to enter the food chain between field and fork. We fully support recommendations to intensify product handling and to make sure water getting to the crop fields is clean. We must, however, protect and increase the practices that are in place to improve water quality coming from ag fields, to increase biodiversity within agricultural systems, and to prevent onerous requirements on farmers. More science is needed to understand where *E. coli* 0157 is coming from and where it is not coming from.



RESOURCES

[1] CAFF website: www.caff.org
Keep up-to-date here on marketing agreement, order and other food safety issues.

[2] The Organic Center. *E. coli* 0157:H7 Frequently Asked Questions. Critical Issue Report. 2006.3 http://www.organic-center.org/reportfiles/e_coli_ final.pdf

[3] Literature reviews for food safety and environmental protection on the Central California Coast: http://zzyx.ucsc.edu/casfs/publications/briefs/brief10.pdf and http://www.rcdmonterey.org/pdf/Food_Safety_Environmental_Protection_2006.pdf

[4] Wollman, D. 2006. Billion dollar bugs. *Science and Spirit.* May/June www.science-spirit.org/new_detail.php?news_id=579

[5] Wild Farm Alliance website: www.wildfarmalliance.org

[6] Audubon California website: www.audubon-ca.org

[7] California Certified Organic Farmers website: www.ccof.org