

FOOD SAFETY RULES LOOM LARGE ON SMALL FARMS

Vern Grubinger, University of Vermont Extension

March 25, 2010

Remember the 3-second rule from when you were a kid? If a piece of food falls on the floor, so long as you pick it up in 3 seconds it's still OK to eat. I doubt that federal regulators would accept that practice, but they have put in place many rules aimed at keeping food safe. The goal isn't exactly to keep food off of dirty floors - it's to minimize the presence of microbes that can make people sick.

When it comes to meat, fish and dairy, food safety rules have been in place a long time, and they're widely viewed as necessary, since those foods, if improperly handled, can harbor some very dangerous organisms. But more recently, new food safety guidelines have been developed for fresh produce, and while everybody wants safe food, questions are being raised about their impact on small farm viability and local food systems.

The food safety guidelines for fruits and vegetables were developed after widely-publicized health scares associated with crops like spinach, tomatoes, strawberries and sprouts. In some cases, the illnesses that led to these scares were found to be associated with produce from big farms out West, or in other countries, where large volumes of produce were sold into the commodity food system. In other cases, while the produce was the carrier for the pathogen, it was never determined where in the food chain the produce became contaminated. Activities such as centralized processing and distribution may have been the culprits rather than farm practices.

After each of these events, farmers and processors of the crop in question lost millions of dollars as sales nosedived until the public no longer perceived the vegetable or fruit in question to be dangerous to eat.

In response, the USDA developed Good Agricultural Practices, or GAPs, a set of voluntary measures that farms can take to limit the risk of pathogens on fresh produce. GAPs address everything from training employees how to wash their hands to tracking the temperature of refrigerators to checking fields for the presence of wildlife every day. GAPs also limit how and when manure can be applied to fields, much like organic farming rules already do. Everybody wants safe food, but the problem with GAPs is the one-size-fits all approach. It may be a good program for large farms, but it was not designed with smaller, diversified farms in mind.

To pass a formal GAPs audit can be time consuming and expensive, as it involves extensive recordkeeping and may necessitate significant investment in new infrastructure on the farm. Such rigorous food safety efforts make sense for large farms that sell a lot of produce to places far away on an anonymous basis. For small farms that market modest quantities of food much closer to home, a less stringent system could be used to address food safety concerns. (GAP audit forms and related information are linked at: <http://www.uvm.edu/vtvegandberry/foodlinks.html>.)

Small and mid-size produce farmers are worried as the pressure to follow food safety rules grows. Some supermarket chains now require all farms they buy from, large or small, to pass a GAPs audit. More markets will likely follow, to cover themselves from risk, real or perceived. In the next couple of years these markets will start using food safety as a marketing tool. They will say “All our produce comes from farms certified in food safety procedures.” Where will that leave small farmers who can’t afford the time or money to implement GAPs? What will they tell consumers that ask about food safety?

University of Vermont Extension, the Vermont Agency of Agriculture, the Northeast Organic Farming Association and local farmers are now grappling with that question. It’s especially important given the huge increase in local food sales over the past few years, mostly from small and mid-size farms that market directly to consumers, food coops, schools and other markets close to home.

Adding to the level of concern and the need for some common sense is pending federal legislation that will likely require the Food and Drug Administration to regulate fruit and vegetable and fruit farms, requiring them to register, pay fees, and follow food safety rules. Again, this may make sense for big operations, but the costs associated with proposed regulations may have a disproportionate impact on smaller producers, those that grow a diversity of crops and/or who have limited resources. Hopefully there will be some exemptions or accommodations based on the level of risk a farm presents given its size and markets.

To learn more about food safety regulation, pending legislation, and the concerns about its impacts small farms, wildlife habitat, and conservation practices, see the National Sustainable Agriculture Coalition’s comprehensive policy brief about food safety on the farm at: <http://sustainableagriculture.net/wp-content/uploads/2008/08/NSAC-Food-Safety-Policy-Brief-October-2009.pdf>

Everybody wants safe food, but how far should small farms have to go to prove that they grow it? Asking them to implement an industrial approach designed for large commodity farms may well drive them out of business. Alternatively, a common sense checklist of procedures, combined with a short course on managing for food safety may be a more realistic, and effective, option for minimizing an already minimal risk. That approach, combined with local farmers putting their name behind every product they sell, could be a rational path to promoting food safety on Vermont’s fruit and vegetable farms. Meanwhile, consumers can do their part to minimize food safety risks by washing fresh produce, cooking meats thoroughly, following good sanitation practices in the kitchen – and buying from local farms where the food is anything but anonymous.