



Food Safety Considerations for Small Producers— and Those Who Support Them

Proactive ways to cope with and improve problematic regulations.

Everyone wants safe food, but approaches differ in pursuing this goal and sometimes the end result is practices and regulations that do unnecessary harm to other values we seek in our food system. This tool will explore the impact of food safety regulations on small producers, how they can cope with some of these impacts, and how those of us who value small family farms and ranches can help guide improved and effective food safety approaches and policies.



FOOD SAFETY IN PERSPECTIVE

Food safety is a part of the “Healthy” aspect of a sustainable food system. While conventional food safety focuses on microbial contamination, many people are also concerned about other contaminants including pesticides, herbicides, and other chemicals.

While it is hard not to consider food safety an absolute, reducing risk to zero is unrealistic. The aim is to reduce the risk as much as possible while making sure practices don’t unnecessarily work against other aspects of a sustainable food system. This is not to say that affordable food prices, nutrition, profitability for growers, or environmental protection are more important than food safety, but that all these values need to be considered when developing regulations and practices.

Many people are concerned that some food safety regulations and proposals are based on false assumptions and faulty reasoning, and are therefore ineffective at increasing food safety and harmful to other values in the food system. Better understanding of the root causes of food contamination, and of practical and effective preventive measures that are compatible with small farms and a healthy overall food system, is essential to improving these policies.



FOOD SAFETY AND SMALL PRODUCERS

Research indicates that the increasing complexity and cost of food safety regulations is one of the most difficult issues facing small growers. Some producers are very actively instituting measures to comply with current and



anticipated regulations and certifications. Many others are paying attention to food safety on their farms, but waiting to see



what new regulations are actually put in place to see how and whether they can comply. Inconsistent enforcement of existing regulations, a lack of clarity in many regulatory areas, and uncertainty about emerging regulations compounds the issue.

ONE SIZE MAY NOT FIT ALL

Small farm advocates point to a variety of issues that warrant special consideration for small farms as regulations are developed, so that an unnecessary burden of time and expense is not imposed on small farms:

- **Diversity:** Small farms are more likely to have a wider variety of crops and to include both crops and livestock. Regulations that are feasible for larger, monocropping operations with one or two crops may not be feasible for the small, diversified farm.
- **Relative Risk:** Massive food recalls from very large farms and their associated processing and distribution operations seem to drive increasing regulations which tend to be applied to large and small operations alike without regard to relative risk.
- **Traceability:** The ability to find the source of food contamination is a fundamental principle of food safety. Many would argue that small farms, especially those doing direct marketing, provide the ultimate in traceability, making costly and cumbersome labeling and recordkeeping unnecessary.



THE ISSUE OF QUALITY OF LIFE

Quality of life for growers is widely recognized as one of the pillars of sustainability, but often is overlooked as a luxury rather than a foundation of a strong agricultural system. For many small family farmers and ranchers, their operations are more than just a business and they prefer a more human than industrial approach, including:

- Relying on the trust they develop with their customers rather than on third-party certifications.
- Keeping those records that help them maintain and improve their operation, but not excessive records that sometimes seem to be more about liability than safety.
- Welcoming family, neighbors, children, and even working animals and wildlife (when appropriate) to their fields rather than automatically excluding them over food safety fears.



For these growers, the current trend of regulations is troubling, and some of the opportunities on the next page may be best for them until more reasonable and innovative policies are enacted.

A FEW STRATEGIES AND CHOICES FOR SMALL PRODUCERS

1. **Learn about food safety, whatever your situation.** Whether you are growing for schools and retail stores or for your own family, it is essential to be knowledgeable about how to avoid food contamination—by microbes or chemicals. This means not only learning about the regulations and the recommended practices, but understanding the ways food can be contaminated so you can make sure the practices you use are effective. It's about food safety, not just liability.
2. **Avoid food safety incidents.** Once a food safety incident occurs, recovering markets and public confidence can take much longer than correcting the problem, and these incidents hurt many more producers than just those directly involved.



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3. Choose your products carefully.

Some foods such as leafy greens and other foods eaten raw tend to be increasingly regulated. If this proves difficult, you might want to concentrate your marketing efforts on less regulated products and keep the greens and melons for your own use or for informal markets. On the other hand, you



may find it financially justified to invest in the training and equipment to meet the regulatory needs of one or more high value crops.



4. Choose your markets carefully. The more formal and distant the market, the more regulated it is likely to be. Seek markets that best fit your situation and needs. Direct markets provide the best opportunity for the buyer to know and trust the supplier.

5. Consider organic certification. If you are considering getting certified for food safety, consider being certified organic as well. Both require farm plans and extensive recordkeeping, so you may recover your investment more readily by tapping into the organic market.

6. Consider “work-arounds.” You can learn a lot from other producers, including ways to cope—honestly and effectively—with problematic regulations. Sometimes the seemingly insurmountable or most bothersome requirements can be met creatively. For example, if you see composting as an art and don’t like the idea of lockstep turning, temperature recording, and the like, you can compost as you always have, but be sure to incorporate it into the soil according to the protocols for raw manure.

7. Collaborate with other growers. You may find it worthwhile to join other growers to establish, carry out, and communicate to the buyer

**BOTTOM LINE ON FOOD SAFETY
FOR DIRECT MARKETS:**

**The grower is knowledgeable
about food safety**

and

the customer trusts the grower.

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effective food safety protocols. It may also help to obtain any necessary insurance more inexpensively. This approach can work well when some minimal processing and aggregation of product is required by specific customers such as stores or institutions.

- 8. Consider informal markets.** If the cost and time involved in meeting special food safety requirements for formal markets is not justified for your operation, or is incompatible with your quality of life, you can still grow for yourself, your neighbors, and friends. The contribution this makes to our food supply should not be overlooked, and should be of increasing importance as more people decide to grow food for themselves and their neighbors.

POLICY CONSIDERATIONS: HELPING IMPROVE FOOD SAFETY APPROACHES AND REGULATIONS

For food safety practices and regulations to be effective and fair for smaller operations, policymakers must hear from small farmers and ranchers and those who support them. The influence of large corporate agricultural food interests is very strong, so a balance of views and influence is needed in order to improve these policies for all concerned.

Clarity and consistency: The more clear the regulations—and the more consistent their enforcement—the better producers are able to safeguard the food supply, comply with regulations, and plan for the future.

Consider scale: Since operations of different sizes have different levels and types of risks, scale should always be considered in developing protocols and regulations. Special attention should be given to the financial and other resources needed for small operations to comply with regulations, to make sure an unnecessary burden is not placed on them.



Watch industry regulations as well: Besides governments, large buyers and distributors—most closely associated with large farms—have the ability to impose their own food safety standards which may not be appropriate or fair for smaller operations.

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Be sure farm ecosystems remain intact: Some current and proposed standards, especially for leafy greens, are turning back decades of efforts to rebuild ecosystems on and around farms and ranches. Misguided requirements are forcing some producers to remove hedgerows and other conservation features that protect soil, water, air, and wildlife.



Assess the risk throughout the food system: No matter how careful a producer may be, contamination can result if their products are processed or shipped unsafely or treated improperly by the retailer or consumer. However, the producer is often dramatically impacted by any failure in the supply chain, even though they may not have created the problem.



Guard direct market venues against overregulation: The case can be made that direct markets which allow free communication between producers and buyers obviate the need for many protocols more appropriate for other markets. Unless policymakers are kept aware of the differing needs of different markets, overregulation can occur. For this same reason, the ability to relatively freely market from the grower's own farm or ranch should be preserved as well.

Take a systems view: Ensuring that food safety efforts don't create additional problems requires that the impacts on all the sectors of the food system be considered as well as the values people want in their food and how it is produced. In addition to critical systems thinking and the good use of scientific data, listening to the perspectives of producers, both large and small, as well as consumers and other sectors of the food system is important for policymakers.

FOR MORE INFORMATION

Find online resources for this tool, as well as additional tool booklets on other community food topics, under "Food System Tools" at www.healthycommunityfoodsystems.org or www.HCFS.org



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