



Pennsylvania
Association for
Sustainable Agriculture

114 West Main Street
PO Box 419
Millheim, PA 16854
(814) 349-9856
Fax (814) 349-9840
www.pasafarming.org

A Message to Public Officials on Food Safety

Brian Snyder, Executive Director
Pennsylvania Association for Sustainable Agriculture (PASA)
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It seems everyone in elected office these days wants to do something about food safety. Who can blame them, given that the headlines on any particular day might carry news of the latest food poisoning scare? It is supreme paradox that, while all of us must eat in order to survive, food can also become an instrument of death. As a community of farmers, we must also come to terms with the fact that harmful pathogens occasionally present in food can originate on farms in various ways that at times defy easy explanation.

However, before anyone moves ahead too fast with regulations that could have far-reaching, unintended consequences for farmers of all stripes, a little additional perspective may be in order. While the Center for Disease Control estimates that as many as 5,000 deaths in this country are caused by food-borne pathogens each year, the National Highway Traffic Safety Administration is ecstatic to report that highway deaths last year dipped to a forty-eight year low – “only” 37,313 were killed in motor vehicle crashes in 2008.

Since many more of our citizens eat every day, as compared to the numbers who travel on the highways, there is clearly some reason to be proud of “food safety” in this country in the broadest sense. I mean, if one wanted to reduce preventable deaths by 5,000 annually, which of the above statistics should garner the most attention? But it is another positive sign to note that few farmers or food processors wish to rest on their laurels, and most would agree that any deaths whatsoever from eating food should be avoided if at all possible.

Now let us consider the desire folks in government have to devise a legislative solution for the problems of food safety. This is a legitimate, albeit politically expedient concern. It is the acknowledged job of government to protect us to the extent possible from negligence and preventable forms of injury and/or death. But it is distinctly NOT the job of government to attempt to eliminate risk in life altogether, nor to impose expectations that may impinge unnecessarily on the free enterprise activities of the citizenry without a clearly understood benefit.

More than anything else right now, we need some plain talk on the real issues involving the safety of our food supply. With good science available on all sides, there is widespread disagreement about what matters most and why any of us should care.

We at PASA believe quite simply that the most important thing anyone can do to reduce risk in the food system is to make it as locally-based as possible. A safe food system is built on trust, and trust is built on actual human relationships. Such relationships are harder to maintain the larger and more diffuse the food system becomes.

Furthermore, we contend that the greatest risks to food safety occur when two systemic factors are combined: a) “food anonymity” and b) geographically broad distribution patterns. The most basic strategies for achieving a safe food supply, therefore, are not only to keep the distribution patterns as local and/or regional as possible, but also to put the farmers’ faces back on the food. In an ideal scenario, both strategies would occur. Whatever else is said about specific practices on a farm or in a food processing facility, these two factors should be acknowledged as priorities and properly rewarded by the regulatory authorities right up front.

With this in mind, the following three-tiered structure seems both to be the current reality in food production and marketing systems, and a necessary framework for any successful effort to further regulate food safety and security:

1. ***Farm-direct*** – This includes farm stands, farmers’ markets, community supported agriculture (CSA) programs (e.g. subscription farms) and other innovative strategies where the relationship between individual farmers and consumers is immediate and understood.
2. ***Identity-preserved*** – This involves distribution patterns on a regional scale where the farmer and consumer do not necessarily meet, but the identity of the farm is preserved on products all the way through the system, from field to fork.
3. ***Commodity stream*** – This represents sales where no direct relationship between farms and consumers exists. The farm identity is vague or lost altogether, sources are aggregated and distribution tends to be widespread, including food exported to other countries.

Taking them one at a time, we believe there should be minimal intervention by the government in regulating practices in the first tier, with respect to private transactions occurring between individual farms and consumers. This means neither that food safety issues are irrelevant at that level, nor that regulatory officials should be prohibited from taking action and even shutting down farm-direct operations demonstrated to be making people sick. It just means that problems arising here can quite naturally be traced quickly and addressed effectively without associated threats to any broad segment of the population.

With the second tier, it is most important to understand that the government has a tremendous opportunity to take advantage of the good things currently happening out there. The goodwill and positive business practices of farmers, processors and retailers who are already participating in local and regional food system initiatives are ensuring a significant degree of traceability that should be supported in any way possible.

Let me say this as plainly as possible. The government has every right to set reasonable standards for food quality and safe production practices. Nonetheless, farmers with their names – and reputations – listed on every package of food should have options to work on a voluntary basis with independent, third-party entities of their choosing in meeting such standards. Such partnering entities might include certifiers of organic, sustainable or natural products, farm

cooperatives, breed associations and other trade organizations with a direct interest in supporting best management practices on the farms they serve.

The third tier represents the vast majority of food product consumed in this country and almost all that is exported to others. The need here for clearly stated and enforced quality and safety standards is obvious and should be a central priority of any food-related legislative agenda in the immediate future. A majority of folks involved with our nation's food system would, I believe, acknowledge this point, so I will not go on about it at length. Suffice it to say that traceability and accountability must either be built right into the core of a farming operation from the start, or these principles must be imposed from the outside.

The essential element here is not that there is some theoretical distinction between "good" and "bad" farmers, but a firm acknowledgement that SOME farmers have chosen to stand behind their products, by name and reputation, all the way to the point of final consumption. This is also not fundamentally an issue of "big farms" vs. "small farms," though it appears unavoidable that vocal contingents on both sides of that divide will try to make it so.

The most pressing concern right now is that, in the rush to do something productive on the most public aspects of safety and security in the food supply, our public officials might take action that will a) do too little, for fear of offending some of the powerful interests involved, or b) do too much and thereby inflict real damage onto one of the most promising trends in agriculture to come along in at least half a century.

Taking these basic considerations into account right now can assist elected officials in focusing on the real issues involved in maintaining the safety and security of our food supply. They can thereby avoid excessive government intrusion and expense that might negatively affect the entire American food system, including farmers, eaters and taxpayers alike. Such consideration could also go a long way in helping to ensure that many of us do not take unnecessary risks on our nation's highways this year just to get to more hearings and listening sessions aimed at reducing the danger of an inherently less risky activity, eating food.

But if we can really get this right, a visionary and "fresh" approach concerning food safety at local, state and federal levels of government might lead to an agricultural renaissance in this country that will do as much for the economic health of our rural communities as it will for the physical health of our people.