



JAKE'S FARM

99 BROWN LYNCH ROAD
CANDLER, NORTH CAROLINA, 28715
Phone 828 665 4472
jakesfarm@msn.com

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Dear USDA;

My background is varied. I have owned three restaurants and am currently a Certified Organic Farmer. I am submitting this comment on behalf of Jake's Farm and Carolina Organic Growers, a marketing cooperative.

I am concerned that the LGMA does little to insure safer food while increasing cost to small farmers to the extent that many will cease to farm. It may be appropriate for very large scale farms, but in fact does little to insure food safety.

My research tells me that this proposal is designed to control or limit the occurrences of food borne pathogens in leafy greens destined to be eaten in a raw state. The two main culprits are e.coli and salmonella. Salmonella is vectored by mammals, birds, insects, and reptiles. It has been shown to live in a dessicated state up to 70 days on paper, and weeks on stainless steel. It can exist in soil upwards of 1300 days. It travels in water, airborne dust, and probably other means yet to be discovered. E.coli infections in 2003 resulted in approximately 50 million dollars in health care costs in 2003, while obesity in that same year cost upwards of 75 billion. Most e.coli infections occur from undercooked meats, not vegetables.

No farmer wants to sell contaminated foods, unless he is of a criminal nature. In California many examples of extreme measures can be sited as a result of this agreement. It is reported to be a voluntary program, but now many buyers are refusing product that is not produced under this agreement. Some famers have destroyed acres of vegetation around their crops. Others have had whole crops refused because a tadpole was found in a water source. The current standards for GAP do not preclude the use of surface waters for overhead irrigation, an obvious shortcoming.

I suggest that we certify farmers with a basic education in microbial contamination, and require ongoing credits, similar to pesticide licensing. It is a fact that science discoveries are moving much faster than regulation can keep up with. This would be a

Eric B36

way that would insure farmers are keeping up with the latest discoveries about these infectious bacteria. Farms could then be given grades as dairy operations already enjoy. I resent control, but would willingly work toward a grade A farm operation. I also think that this present attitude toward commodity specific regulation is redundant, expensive, and lacks common sense. It would seem that regulations ought to include all vegetable that are or could be consumed in a raw state.

Our method of controlling mammalian and reptilian pests on our farm is through the use of working breed dogs. They also control nesting birds in our tomato vines. I would ask that exceptions be made for allowing these hard working animals in our fields.

Certified Organic farms already address many of these same issues and asking us to double up our record keeping would be unnecessarily expensive and also redundant. We are a truck farm, meaning we grow any and all crops that survive in our region. Farms experience micro-climates and unique geographical aspects and that fact needs to be taken into account with any regulations forthcoming. Many of my fellow farmers in the mountain regions produce vegetable and meat or dairy product on the same land.

I am concerned about food safety and always have been, for that reason we don't practice animal husbandry, furthermore the composting regulations that already exist concerning Organic farms is very strict and I only use compost produced by those who manufacture it professionally. Just because that has been our choice I would not like to see any regulations that would prevent such actions from those farmers who do desire to have those options open for them.

Sincerely,
Christopher Sawyer