

Ligon, Torey

My name is Torey Ligon and I work at the Food Conspiracy Co-op in Tucson, Arizona. Since 1971, Food Conspiracy Co-op has been a member-owned, cooperative food store specializing in organic and natural groceries. Our Co-op is jointly owned by almost 1,500 Tucson families and we are open to the public. Our signature department is our produce section and we feature organic fruits and vegetables and many locally grown products from small farmers in Southern Arizona. Over the past two years, we have experienced double digit sales growth as more people in our community seek out the fresh, healthy, sustainable products that we offer.

In my job as the Marketing and Membership Manager, I interact on a regular basis with our members and customers. My interactions with shoppers happen informally in the aisles of the store, and more formally through customer satisfaction surveys, member elections, and Board committee work.

In addition, it is my job to stay on top of trends in the natural food marketplace so that we can best meet the future needs of our members and shoppers. It is with these future food trends in mind that our store pioneered a retail level labeling program for foods at risk of containing genetically modified organisms (GMOs) in the 1990s.

It was also in anticipation of customer demand that we began a comprehensive labeling program for locally grown and produced items in our store. In our produce department, all fruits and vegetables are labeled with their country or state of origin. For any items grown in Southern Arizona, items are labeled with the name of the farm, the name of the farmer, and the distance from the farm to our store. For all products that we purchase from wholesale distributors, we prioritize foods grown domestically in neighboring states and items grown on small and mid-sized farms. Our customers tell us in annual surveys that they support organic farming, sustainable growing methods, fair treatment of workers and humane conditions for farm animals. Our sales reflect our customer's willingness to pay more for sustainably grown foods and their preference for labeled locally grown items whenever there is a choice.

As a representative of the 1,500 member-owners of Food Conspiracy Co-op, I have come here today to express our opposition to the proposed Leafy Greens Marketing Agreement. I believe that this agreement is not in the best interests of our customers or our business.

After reading the proposed Leafy Greens Marketing Agreement, it appears that this agreement may require testing and sanitation procedures that are unrealistic and unnecessary for small and mid-sized farms. In addition, the agreement does not appear to offer enough safeguards to protect the unique growing methods of organic farmers. By encouraging farmers to adopt new food safety metrics under this agreement, I worry that some farmers may be pushed away from established sustainable farming practices such as the promotion of biodiversity, crop rotation, and organic pest control. The bulk of our produce comes from small to mid-sized organic farms and our business is based on our ability to continue to offer consumers an alternative to the industrial scale conventional and organic food items found in most grocery stores.

It appears that by adopting this agreement, the USDA would be approaching a complex problem with a one-size-fits-all solution designed, primarily, to address the risks posed by the largest

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producers. Small and mid-sized organic farmers do not need additional obstacles to further disadvantage them in their attempts to compete with large industrial farming operations.

This marketing proposal reminds me of another marketing agreement that has negatively impacted our customers and our business. Two years ago, the California Almond Board implemented a set of food safety standards that now requires all domestic almonds to undergo a fumigation procedure, or, in the case of organic almonds, a steam treatment. This new standard was implemented after a salmonella outbreak was linked to almonds from one of the largest conventional almond growers in the nation. All almond growers, including organic growers and small and mid-sized farms were forced to comply with these new standards.

For a portion of our customers who follow a raw food diet, raw almonds are a critical ingredient in daily meals and a significant source of protein. With the implementation of this food safety standard, some of our customers began driving to California to get farm stand raw almonds because direct to consumer sales were exempted from this agreement. This resulted in loss of sales for our store, and frustration on the part of many customers who didn't have the time or the means to drive to California to buy almonds. A month after this new standard was implemented, our store began importing raw almonds from Italy to satisfy demand. Small and mid-sized organic farmers in California are now losing business to almond growers in Europe because of a hastily implemented food safety standard designed to control risk in large scale conventional almond facilities.

While the proposed Leafy Greens Marketing Agreement is voluntary, I have reservations about how voluntary it really will be. What happens when Veritable Vegetable, our primary produce handler decides to sign on to this marketing agreement. According to this proposal, "signatory handlers could only handle leafy green vegetables from (1) producers within the production area who meet the requirements of the program, or (2) producers and handlers outside the production area who meet the requirement of the program" (pg. 45566). We work with Veritable Vegetable, in part, because of their commitment to small and mid-sized farms. Our customers regularly tell us that they shop with us because of *our* commitment to small and mid-sized farms. While you may be thinking that Veritable can choose to not participate in this agreement, what happens if one of their larger retail accounts, say a regional chain that they supply, demands that they comply? Will we lose our ability to purchase organic leafy greens from small and mid-sized California farms?

Food safety is a concern for all retail stores, and yet, this agreement does not inspire confidence in me that my customers would benefit from implementation of this proposal. At Food Conspiracy Co-op, we want to see food safety standards that explicitly differentiate between the food safety risks posed by farms of different sizes. We are also committed to organic agriculture and cannot support any metrics that do not encourage farmers to move toward more sustainable, organic growing methods. On behalf of the members of Food Conspiracy Co-op, I urge the USDA to reject the Leafy Greens Marketing Proposal.

Thank you.