

My name is Ken Stearns. I'm the Food Safety Director for D'Arrigo Bros of California. I have been working at D'Arrigo since May, 2007. Additionally, I have been directly in charge of managing food safety programs in CA since 1997. Overall, I have worked in the AG industry in California since 1982.

I am an ASQ Certified Quality Auditor (1998), ASQ Certified HACCP auditor (2000) and have passed ISO-9000 Lead Assessor training. I have also worked with the California Certified Organic Farmers group and organically certified a small mushroom farm in the central coast.

Our company farms over 10,000 acres of leafy greens in the Salinas Valley as well as over 5,000 acres in Arizona. We have nearly 1,800 employees harvesting our various crops. Our company was an original signatory to the California Leafy Greens Marketing Agreement. We whole heartedly support the LGMA and expansion of the program to a national level.

Currently, our food safety program is based on the California and Arizona Leafy Greens Marketing agreements. We also have a HACCP program for our company that starts at the soil preparation in the field and ends when the finished product is placed in a refrigerated trailer for the market. Our ranches and crews are also audited for Good Agricultural Practices by an outside 3rd party auditing group: Primuslabs.com.

Over the last 25 years, I have been involved in implementing in a variety of Quality Assurance and food safety programs in the agricultural industry such as GAPs, GMPs, HACCP, Benchmarking, Total Quality Systems, and ISO-9000, as well as developing hybrids of these programs for previous employers.

In my experience, focusing primarily on Good Agricultural Practices and Good Manufacturing Practices are the programs that have worked best for the farmer. When Quality Control and Quality Assurance Programs like TQM and ISO-9000 were tried as a methodology on a farm, these programs failed, mostly in part because it was found that these programs required following established, generic standards –basically “one size fits all”. These programs are designed for a manufacturing process, not an environmentally driven process.

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We've gotten pressure from buyers to participate in ISO-9000 based programs such as SQF, GFSI and Global Gap quality assurance/food safety programs. I've reviewed these manufacturing based QA/QC programs and again see the same program structure and inherent problems and philosophies of the programs I had to work with.

They are costly to establish as these programs require specialized training by outside entities, development of a documentation nightmare to meet the multitude of sections to the program (many of which are not targeting food safety, but rather manufacturing commitment) and probably most important- the inability of these programs to effectively interact and change with the industry involved.

In comparison, the LGMA is a vital program with active committees that interact directly with the USDA, CDFA, and academia to address issues to the metrics or simply meet to consider the most recent findings in science or concerns of the government.

So let's get down to basics: Does being a participant in the LGMA make our products safer than any other food safety programs? Do we really need it? Is it cost effective? Does it force farmers to destroy riparian areas?

Our company follows LGMA standards in all our commodities, not only leafy greens. The required in-depth reviews of the LGMA focus points plus the multiple, extensive audits in our leafy green products during the growing season definitely make our products safer. Again, it is a science based, commodity specific and it identifies establishes and addresses specific concerns identified for leafy greens. What other program can currently make this statement?

Do we really need it? I see what the alternatives are and do not know of a single one that addresses the most probable food safety issues to leafy greens to the depth of the LGMA standards. It gives customers and consumers confidence in our products. We can readily explain exactly what we are doing in an understandable way to the common person.

Is it cost effective? Yes. I've looked at the costs of several QA based programs and know they could double our current food safety administration costs. Our customers can compare our program to over 130 leafy greens growers in California alone. We already are following and paying for one common food safety program so acceptance on a national level may eliminate redundant costs occurred in external 3rd party audits.

Does the LGMA force us to destroy riparian areas, wetlands and fence out migrating frogs? No. These issues are customer driven.

What must be understood is that today, retailer and food service companies have not waited to see what food safety certifying body the grower will choose. For a majority of farmers, that choice is being made for them by forcing the farmer to select from a list of auditing groups following their own take on what food safety items need to be addressed. These private, external 3rd party groups will bend their programs under the pressures of the retailer and food service groups that accept them. This is not how a food safety program should work.

If we do not see the National Leafy Greens Marketing Agreement on that list in the near future, then what will we see? Personally, I haven't seen a better program offered and cannot imagine what an improved program could actually be.

The LGMA is a legitimate program that can address the dynamics of a changing and evolving environment in food safety. It has a proven track record of success. It is the best solution for these times; it makes sense; it works; we need it nationally.