Pennsylvania Association for Sustainable Agriculture

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

October 6, 2009

Testimony of Brian Snyder
Executive Director
Pennsylvania Association for Sustainable Agriculture (PASA)
USDA Leafy Greens Marketing Agreement Hearing
Columbus, Ohio

My name is Brian Snyder, and I am executive director of the Pennsylvania Association for Sustainable Agriculture – better known as PASA. Our organization, chartered in 1992, represents nearly 6,000 people, the majority of whom are farmers, mostly distributed throughout the Commonwealth of Pennsylvania and in surrounding states, including here in Ohio. Our programs include educational workshops featuring farmer-to-farmer exchange of information and marketing activities focused on the regions we serve within Pennsylvania. However, PASA is best known for our annual conference, held in State College each February and drawing 2,000 participants from across the United States and several foreign countries.

About half of PASA's farmer members are involved in raising leafy greens and other vegetables as a component of diversified production systems aimed at local and regional markets. Most of those sales are direct-to-consumer, through farmers markets, restaurants and Community Supported Agriculture (CSA) programs. In fact, a small but increasing number of our CSA farms sell over 1,000 shares of the harvest – some as much as 2,000 or more – each year to their eager customers, showing how popular that model has become in recent times. But an increasing number of these and other "smaller" farms balance their direct sales with other market venues through "handlers" as they have been defined in the notice of this hearing. Such sales allow for expansion of farming operations, but more importantly, for diversification of markets as part of an overall strategy to manage risk on the farm. We anticipate this trend continuing in the immediate future, as more and more retailers and distributors consider strategies for aggregating fresh products from a broad array of locally and regionally based farms.

Other efforts to maximize revenue, while minimizing risk, in the marketing of fresh products from our members' farms include certification programs of various kinds (predominantly but not exclusively organic) and the employment of specialized methods and techniques that are meant to protect the environment or better serve communities while also keeping the farms viable. A common factor in nearly all these strategies, however, is that the identity of the farm, and the farmer involved is maintained and reported to consumers who buy these products. This is a practice that guarantees traceability of the food being sold, even as it increases consumer confidence in less tangible ways. So much is said these days about modern consumers being out of touch with the sources of their food; almost everything our members do in terms of marketing is intended to directly address and rectify that problem.

To come right out with it, PASA is opposed to the Leafy Greens Marketing Agreement (LGMA) as posted in the Federal Register on September 3, 2009 and being discussed at this hearing today.

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We derive very little comfort from the statement that "the proposal was submitted by a group of representatives (proponents) of a cross-section of producer and handler members of the fresh produce industry" that claims "to represent a majority of the volume of leafy green vegetables produced for the U.S. fresh market" . . . stated as though the vegetables themselves were being asked to vote on the matter. The list of proponents does not look representative at all, whether assessed from the perspective of geography, market segmentation or consumer preferences.

We all know and appreciate the role of the United States Department of Agriculture (USDA) in supporting the agricultural community as broadly as possible. To that end, it often ends up that the status quo "majority" in this community gets supported, to the detriment of some of its most innovative members who happen to be in the minority (vegetables included). I submit that it is not only the responsibility of USDA to support the way things are in agriculture, but more importantly, the way things could or ought to be in the future, especially as we work together to assure the safety of food for public consumption. Consumers increasingly understand that the safety of their food supply is indelibly linked to an understanding of the sources of that food, most particularly involving the ways in which food is produced, handled, packaged and shipped to their local market outlets. Following both the science and common sense involved, these consumers are asking for more diversified food systems that are locally and/or regionally based, emphasizing thorough and reliable information, which enables average people to make wise choices on behalf of their families.

Simply put, we believe the proposed agreement has been presented on behalf of a predominantly consolidated industry in the interest of increasing and solidifying that consolidation for the longer-term future. Once a handler becomes a signatory to this agreement – and the pressure to do so will likely seem nothing like a voluntary process – they will become a part of the system and forbidden to deal with producers and other handlers who are not. The handler may have some limited choice in signing on, but producers who wish to access the market represented by that handler will not. This will almost necessarily decrease consumer choice as well and, more significantly, move the whole system away from that place our collective conscience would direct us, i.e. to a more widely diversified and dispersed arrangement that minimizes risk for everyone involved, whether we're talking about food safety or economic security.

The Agricultural Marketing Service (AMS) is intended to serve the marketing needs of the agricultural community in this country. Their own administration has stated that "AMS is not a food safety agency." But I submit that, while it might serve the immediate marketing needs of the largest producers (and most vegetables), as the hearing notice makes clear, the current proposal would in fact fail to support the majority of growers who now produce leafy greens on a variety of scales. Of course, that majority of growers might well become the minority soon enough, because the LGMA will likely force them to comply or step aside altogether. From a marketing point of view, the last thing most smaller-sized, independent farmers need right now, whether we're talking about leafy greens, dairy products or any other commodity-specific group, is a government-sponsored, vertically-integrated market syndicate against which they must compete.

Besides this underlying potential reality, to which we are firmly opposed, PASA also has the following specific points to make with respect to the LGMA proposal as published:

- There are no protections built into the current proposal for producers who might need to meet multiple inspection regimens (including especially the requirements of organic certification) in order to market their products. Many of these producers are also facing requirements imposed by specific market outlets (e.g. supermarkets), and it seems that new FDA regulations and compliance procedures may be in the pipeline as well.

- For a program that offers multiple assurances of relying on "science-based" information, the design of the proposed zones that would subdivide the production area is decidedly unscientific. Meaningful subdivisions would be possible, based on a variety of criteria including climate zones, soil types, the overlap of population and production potential, transportation routes, etc… But the zones as proposed could have been designed by the collective efforts of most any first grade geography class. This is to say nothing yet of the very odd and as yet unspecified methods that have been employed for distributing the proposed National Leafy Green Vegetable Administrative Committee membership.

- Since it has been asserted that "the proponent group states that the proposed agreement has been discussed with leafy green vegetable growers, handlers, including those importing leafy greens, trade associations, and other industry stakeholders for more than a year," we might be entitled to expect that the largest sustainable agriculture group in the Mid-Atlantic region (PASA) would have been consulted as well, but to date our opinion has not been directly solicited. Our producers and handlers may not match very well the model represented by proponents of the LGMA, but as a potential USDA program, such a project would need to serve the needs of more than just the largest production units that are out there.

In conclusion, we'd like to make clear PASA's support for improved food quality and safety throughout the food system in the United States and the world. We believe, however, that the most important factors in achieving that objective are to promote more in-depth information, meaningful choices and positive involvement on the part of consumers in engaging with the folks who produce, handle, market and prepare their food. Such factors result from a system that is as widely dispersed and diversified as possible – as common sense tells us, putting all one's eggs in a single basket is a bad strategy for producer and consumer alike. The proposed LGMA would take us further away from the food-safety solution we need, even as it threatens the livelihood of many of the farms we will need to get there.

Thank you very much for the opportunity to present our views on this important matter.