

TESTIMONY OF TOM WILLEY, OWNER, T & D WILLEY FARMS, Madera, California at the hearing on the proposed National Leafy Green Marketing Agreement, Monterey, California.

My wife and I own and operate a 75-acre, certified organic truck farm just outside of Madera in the central San Joaquin Valley. We grow over fifty vegetable crops, including many in the leafy green category, farming the year round to supply West Coast specialty retailers, restaurants and our own local subscriber network of 800 families who are members of T & D Willey Farms CSA. I've spent most of our farm's near 30-year history pursuing the knowledge and art of biologically intensive soil management in an effort to gain a reputation for the most tasteful and nutritious produce in the marketplace. I am proud to boast a handful of my soil harbors nearly six billion living microbial organisms of vast diversity, equal to the number of human beings inhabiting earth, which generously power the fertility cycle upon which we all depend for our very lives. Eschewing toxic inputs while relying only on biological processes to grow high quality, high yield vegetable crops is a stimulating intellectual and scientific challenge for which I and my customers have been well rewarded. I'm afraid some significant problems in food safety and misguided approaches to their solution, like NLGMA, could derail achievements in biological agriculture and a greater promise of food made safe through respect for and cooperation with the microbial community which owns and operates this planet upon which we are merely guests. The antibiotic resistant and increasingly virulent organisms contaminating our produce from time to time are mutant creatures introduced into the larger environment from confined industrial animal operations across the American countryside. CAFO's using as much as 70% of the nation's annual antibiotic supply in subtherapeutic feeding regimes to mitigate crowding, stress and unnatural diets have been documented by the Pew Commission on Industrial Farm Animal Production to have created at least several of the very dangerous pathogens which episodically threaten today's produce supply. This commission's membership includes such environmental wackos as Dan Glickman, former USDA secretary of Agriculture and John Curlin, former Kansas Governor. Why our vegetable industry refuses to throw rocks at the glass house of industrial animal production is beyond me to comprehend. Instead we pretend it is possible to superimpose a paradigm of sterility over vegetable farms by implementing the more extreme practices suggested by LGMA or rogue buyers and processors to mollify an ignorant and nervous public. If animal manures were an inherently dangerous agricultural input, the human race would have long since become extinct; instead its judicious use has remained a hallmark of good fertility management for centuries if not millennia. If manure is now uniquely dangerous,

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we must investigate why and rectify it or prepare to pack animal waste into space capsules for rocketing to the moon. The cornerstone of my farm's fertility program is thermophilically digested composts from both dairy cows and urban green materials. These are produced to rigorous NOP standards and regularly tested for the absence of human pathogens. Robust and diverse soil microbial communities, enhanced by additions of quality composts, have been demonstrated to be less friendly environments for human pathogens by excluding or more quickly eliminating them. There is no recognition given this proven strategy in LGMA metrics, on the contrary a great pall is cast over the use of manure or compost that would frighten your average grower to death. We test our water for human pathogens and impose worker sanitation protocols but I refuse to soak my produce in chlorine or ozone baths out of respect for a healthy association people require with soil life for digestion, nutrient absorption and healthy immune function. Besides, disrupted microbial ecologies, even on leaf surfaces, offer greater colonization opportunity for pathogens, also completely unrecognized in LGMA metrics. So in short, I do not wish to join the club, which I'm told is my sole prerogative. But LGMA competitors, pursuing sterility, will sport a USDA approved seal suggesting their produce is safer than mine when the opposite could very well be true. I've already lost my Canadian accounts as that nation's government, in ignorance, prohibits imports of leafy produce not signatory to the current LGMA. The alternative potential of unleashing moon-suited FDA squads over vegetable farms may be less palatable than a privately regulated LGMA under Department of Agriculture authority. However, I cannot personally endorse an approach to produce safety which is essentially a marketing gimmick, as is the LGMA scheme. Our entire society must take more responsibility for the quality and safety of the food we eat. Much more publicly funded research and education will be required to forward greater food safety in our over-industrialized cheap-food system. Fortunately the National Institutes of Health has recently launched a five-year research initiative, the Human Microbiome Project, to uncover the complex relationships our species enjoys with cohabiting microbes enhancing human health. On and within the body of a healthy adult, living microbial cells outnumber human cells by a factor of ten to one. The human body is more properly described as an ecosystem, hosting trillions of microbial hitchhikers in elegant symbiosis. I've dedicated my farming career to the enhancement of these interspecies relationships through the food I grow for my customers. Misguided approaches to food safety arising from an atmosphere of hysteria and ignorance threaten to disrupt the genuine advances this nation requires to improve its food and our citizens' health.