

Testimony of Beth Bland
Agricultural Marketing Service, US Dept of Agriculture
Docket No. FV09-970-1
Leafy Green Vegetables Handled in the US
September 30, 2009
Jacksonville, FL

Hello. My name is Beth Bland and I am the Food Safety Program Coordinator with the Georgia Fruit and Vegetable Growers Association. About 10 years ago, Georgia producers came to our Association asking for help understanding the, then, new food safety guidance, programs and accompanying 3rd-party audits. They were also asking for help to alleviate the costs of implementing those programs and audits.

As a result, the Georgia Good Agricultural Practices Food Safety Program or Georgia GAP Program was created. The Georgia GAP Program is a collaboration between several different organization with specific duties. The Georgia Fruit and Vegetable Growers Association is the administrative body that helps with education and implementation of food safety programs on the farm and in packing facilities and serves as a liaison between the grower/packer and auditing body. Currently, we have approximately 60 certified producers and packing facilities in our Georgia GAP Program and provide food safety consultation to countless others nation-wide through various produce educational conferences and commodity partnerships. I spent about 70% of my time helping educate and implement food safety on farms and in packing facilities.

We support the National Leafy Greens Marketing Agreement for many of the same reasons you have already heard in testimony, but mainly because of the development of NATIONAL best practices and the adoption of science-based, scalable, and regionally flexible metrics in conformance with the FDA's guidance and regulation. Coupled with corresponding audit metrics, these best practices would minimize microbial contamination of fresh leafy green vegetables in the growing and handling processes,

enhance the overall quality of fresh product in the marketplace, and boost public confidence in these commodities.

Over the past 4 years, I have watched food safety move from an annoyance among producers to the present, where it is an essential business aspect of the entire operation. The driving force behind food safety implementation on the farm and in the packing facility has been our customers and consumers. It is the retail and food service industries who have caused the exponential growth of the food safety industry. I applaud these industries for their commitment to consumer well being and overall consumer confidence. However, because of the lack of federal oversight, food safety compliance has become unbearable for many. It is a very common scenario for a farm or packing facility to experience multiple audits because different customers require the use of different audit companies.

In April of 2009, the United Fresh Produce Association hosted the Global Conference on Produce and Food Safety Standards. GFVGA participated in this conference which compared many of the major auditing firms across the world and found that anywhere between 80-90% of the audit questions were the same. Yet our producers and packers are having to spend countless hours away from their growing, packing and shipping operations answering the same questions over and over and over again. Having ONE, uniformed yet regionally specific food safety metrics for participants could be accepted by retail and food service customers is a move in the right direction. It will save participants time and money. The Georgia Fruit and Vegetable Growers Association supports federal oversight as the only way to further adoption and implementation from our customers as well as enforce and insure compliance with such food safety guidance.

During my time in this role, I have spent countless hours with large and small growers alike educating them on the importance of food safety, but more importantly the

practical application of these programs in their operations. Regardless of the size of the operation, those who have never had a food safety program are always apprehensive and can relay some fantastic horror stories and myths about food safety audits they have heard. Equally, I can testify to the countless people who feel that food safety programs are going to put them out of business. After walking through their fields and operations, I have been able to show most of them how their misconception was incorrect. They realized that meeting the guidance set up by FDA and most food safety organizations are easily attainable and can be cost-effective.

This being said, education is going to be a key element to the adoption of the National Leafy Greens Marketing Agreement by handlers and their suppliers. If the NLGMA is passed, I would ask USDA to consider developing useful tools to help participants of all sizes to develop, implement and execute a leafy greens-specific food safety program. I would also suggest having educational sessions around the nation to help producers and handlers understand what a food safety program entails to help debunk the myths that are so prevalent.

Part of that education is going to be helping people understand that one region or state will not have total control over the Marketing Agreement Administrative Committee or in developing the food safety program and audit metrics. The “metrics” associated with the national marketing agreement have yet to be developed. While it is reasonable to assume they will follow the format already in place in state programs such as California and Arizona, it is the Technical Review Board, established by the National Marketing Agreement Administrative Committee, that will be charged with developing metrics tailored to address varying risks, production practices and environments. I have reviewed the food safety metrics used for California and Arizona and they appear to be feasible in very diverse production environments and by a wide variety of different size operations. In fact the success of these programs in meeting industry needs has led to the proposal that USDA consider a similar national program. I support the commitment

of the USDA and NLGMA to address the unique risks presented in different regions as well as varying production practices across the country.

Another consistent concern I hear from farmers of all sizes, is that they see the benefit of food safety but they resent the fact imports do not seem to have to comply with the same food safety guidance. I support this National Leafy Greens Marketing Agreement because as it is administered by USDA it would allow handlers of both domestically grown and imported leafy greens to voluntarily participate in a program. This Marketing Agreement would go beyond state and national boundaries so that participants across the world could jointly implement uniform food safety and best practices along with corresponding verification programs that could reduce the potential for microbial contamination in these crops.

The success of this program comes in maintaining its voluntary status for handlers. However, we believe the agreement can have the greatest positive impact if the large majority of the industry chooses to participate. Ultimately, an agreement would support the marketability of fresh leafy green vegetables and overall stability of the industry. I believe all handlers and producers, regardless of size or growing method such as organic versus conventional, should be included. Only then can we help reduce the risks of the potential contamination.

We, as the Georgia Fruit and Vegetable Growers Association, are working hard to represent the best interest of our growers, handlers and allied members. We believe the National Leafy Greens Marketing Agreement is in the best interest of our Georgia members as well as the entire nation. Thank you for the opportunity to share my thoughts with you today in support of the National Leafy Greens Marketing Agreement.