



Community Alliance with Family Farmers California (CAFF)

Leafy Green Marketing Handler Agreement Position Frequently Asked Questions

CAFF's Position:

- These rules should not apply to traditional, whole leafy greens. Processed leafy greens (which the industry calls “fresh cut”) are high risk and the rules should focus on them.
- Based on data CAFF compiled from the US Food and Drug Administration, since 1999, 80 percent of California’s leafy green *E. coli* 0157:H7 outbreaks and 98.5% of the reported illnesses have been traced back to processed bagged salad. No outbreak has been traced back to whole, intact produce from traditional family farms.
- Some of the practices that are discouraged (such as biodiversity of microbial life in the soil) may actually reduce pathogens such as *E. coli* 0157, so these misplaced guidelines may not only hurt biological farmers and the environment, but they may also be harmful to food safety.
- CAFF and the farmers we represent acknowledge that all farms face potential food safety problems. We are working with local produce distributors, the University of California, and other government agencies to create a more practical, less costly and more environmentally friendly approach to food safety that diverse, traditional farmers of all sizes could implement.

Greens at Risk:

Iceberg lettuce, Romaine lettuce, Green leaf lettuce, Red leaf lettuce, Butter lettuce, Baby leaf lettuce, Escarole, Endive, Spring mix, Spinach, Cabbage, Kale, Arugula, Chard

Marketing Agreement and Marketing Order

- The California Leafy Green Marketing Agreement (CA LGMA) is voluntary for handlers and shippers.
- Once a handler signs onto the Agreement, they are legally bound to follow the Agreement's rules, which were designed by and for large grower / shipper (handler) operations.
- The next step, a Marketing Order, would make CA LGMA rules mandatory. A handler Marketing Order would be voted on by handlers (farmers would not vote) and, if it passed, it would legally force all distributors and handlers to join the agreement and any farmer that sold to any handler or distributor would be required to comply with the rules.
- Local grocery store and restaurant customers will be affected because, under a Marketing Order, any grower that does not follow these rules cannot have a distributor deliver his or her produce to a store or restaurant, producers can only deliver it directly themselves, which would be very costly.
- The minimum cost to each grower to comply with the audits associated with the California LGMA metrics would cost farmers tens of thousands of dollars. Many small- and medium-sized growers may stop growing leafy greens due to the cost and/or the stress of compliance.

II. Biological Practices and Biodiversity

- The rules do not directly eliminate all biodiversity on farms, but they discourage it.
 - They discourage wildlife on the farm and any vegetation that could harbor wildlife.
 - They consider deer to be animals of significant risk, when in fact a very low percentage of deer have been found to harbor pathogens, and these only in research done outside of California. The rules encourage fencing to keep them out, which impacts wildlife corridors.
 - If there is any question or doubt cast by the rules on conservation practices that protect water quality, native species or ecosystem processes, they may simply be eliminated to limit risk, damaging the environment.

- One result of the CA LGMA rules is that now different firms (such as chain grocery stores and fast food chains) are competing with one another to see who can have the most extreme rules.
 - Buyers are sending auditors around demanding that farmers remove hedgerows, trees, riparian vegetation, grasses, and other habitat, that they erect fences against deer and pigs, kill rodents and frogs with poison, and enact other extreme measures, most of which are not scientifically based.
 - Without a cap that does not allow rules to go beyond the CA LGMA, we fear that this type of scorched-earth approach will become the norm, and that people who know little about farming will demand a sterile approach to food production.
 - The Resource Conservation District of Monterey County published a survey this summer of Central Coast growers, which documents that eighty-nine percent of the growers who responded to the survey indicated that they have adopted at least one measure to actively discourage or eliminate wildlife from cropped areas.