



***A Local Voice at
the National Table***

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New England Farmers Union is opposed to the proposed National Leafy Green Marketing Agreement (NLGMA). While billed as voluntary, the proposed agreement would place a great deal of power in the hands of sellers, processors and distributors of greens, essentially forcing farmers to comply with standards that they will have little role in crafting.

The core problem with the proposed agreement is the effect it would have on American consumers' confidence in the safety of our food supply. *All* Americans have the right to safe food, and claiming that certain foods sold in the U.S. are "safer" than others only for the purpose of gaining a competitive advantage in the marketplace is disingenuous and unethical. If this agreement is allowed to move forward, it will, in effect, give the largest produce handlers (meaning processors, shippers and packers of leafy green vegetables) the power to establish on-farm practices for all growers of leafy greens, regardless of a farm's size.

The proposed NLGMA will not make our food safer, but will only serve to put additional power in the hands of an already-concentrated industry and place another burden on small family farmers, while ignoring the threat of foodborne illnesses from processing and from imported vegetables.

In addition:

-- Small, owner-operated, diversified farms are producing the safest and most nutritious food in this country. If any problems occur, these events are isolated, given smaller geographical marketing footprints. It would be a blow to produce safety if this growing trend toward diversified, regional production is competitively injured.

-- The NLGMA will be a setback for diversified farms. The makeup of the proposed committee that would set the regulations suggests that the food safety benefits of sustainable farming practices will likely not be factored into the NLGMA's standards. Farmers who use sustainable methods and choose not to follow the NLGMA's standards will likely to be shut out of the market.

-- With large-scale growers setting the standards, the rules will undoubtedly be written to fit large-scale, monoculture growers. They are likely to place unnecessary or even impossible-to-meet burdens on small-scale and diversified farmers, rather than developing regulations that provide scale-appropriate compliance standards.

-- The NLGMA will give agribusiness industry representatives authority to self-regulate for food safety, which does make sense given their track record.

-- The NLGMA will do nothing to tackle the cause of the problem, which is, in most cases, bacterially tainted manure from confined animal feeding operations (CAFOs) that contaminate nearby fields and waterways.

-- The NLGMA has been issued by the U.S. Department of Agriculture's Agricultural Marketing Service (AMS), which has no food safety experience or expertise. The Food and Drug Administration is responsible for setting and enforcing food safety regulations, and this proposal would add an unnecessary additional layer of oversight and paperwork.

The New England Farmers Union urges AMS to reconsider this agreement, and include greater representation from small and diversified farms in drafting any further rules and processes.

Respectfully submitted,
Annie Cheatham, President
New England Farmers Union