

July 28, 2011

Melissa Schmaedick
USDA Agricultural Marketing Service

Melissa.Schmaedick@ams.usda.gov

Subject: Exception to PMA No. 970, 76 Fed. Reg. 24292

Dear Ms. Schmaedick:

The Wild Farm Alliance is not in support of a National Leafy Green Marketing Agreement (NLGMA). Marketing food safety is a questionable way to achieve public health. Leafy greens in California and Arizona are not safer because of their LGMA's.

Reducing the number of food safety audits a farmer has to go through is a laudable goal, but we have not seen that play out in CA and AZ. In fact, many of the same signatories of those LGMA's are the companies that require their own company food safety audits.

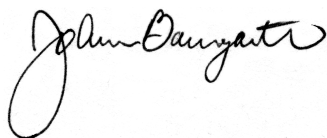
If the USDA is to go forward with the NLGMA, it should limit its reach to just include the fresh cut, processed and bagged leafy greens – these products are inherently riskier than hand-harvested whole heads of lettuce or bunches of chard. Machine harvesting can miss the presence fecal matter, and washing this product can spread the contamination to the whole harvest.

The NLGMA governance structure needs better access for non-NLGMA farmers, conservationists and consumer advocates. Non- NLGMA farmers should be allowed to serve on the Board. That way small farmers who don't sell through NLGMA handlers will be able to bring up NLGMA issues that may affect them. Seats should be allocated for the EPA and for non-agency conservationists so that this agreement develops metrics in support the co-management of food safety and conservation. In addition, the Secretary of Agriculture should make yearly appointments to the Board, instead of Board members appointing their own, in order to encourage diverse participation.

If the NLGMA rule is approved, the food safety audit metrics should be reviewed yearly, instead of every three years, so that newly released research and understanding is considered on a timely basis. Proposed changes to the metrics should be able to be made by the handlers and farmers both associated and not associated with the NLGMA, and by conservationists and the general public. The decision process should be transparent, as the CA LGMA is now attempting to do.

Food safety alternative compliance measures similar to those provisions in the Food Safety Modernization Act (FSMA) should be included in the NLGMA for small and mid-sized producers, if a final NLGMA rule is issued. Otherwise, one size fits all will impose hardships on small farmers, and discourage those who are considering becoming farmers to make that leap. With the number of U.S. farmers at an all time low, we can not afford to lose anymore.

Sincerely,



Jo Ann Baumgartner, Executive Director

WFA promotes a healthy, viable agriculture that protects and restores wild nature.



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