



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

CCOF Food Safety Platform

- Food safety is a shared responsibility. Organic food producers and handlers **of all scales** and in all regions must be concerned about providing safe food. The steps taken to assure safety must be customized for each situation, but must incorporate principles discussed below.
- We support food safety legislation as long as it doesn't duplicate what organic farmers and processors already do under the National Organic Program (NOP) rule, and as long as it doesn't conflict with the NOP. This would include any provision that requires "sterile" farming -- i.e. removing wildlife habitat, buffers, hedgerows, etc, in order to discourage the presence of wildlife or other organisms.
- Fees that farmers must pay should be kept at a minimum. Any fee assessed for implementing new food safety programs is a sliding scale fee, as opposed to a flat fee. The largest segment of farming in America is the small to mid-size farms, and fees can add up very quickly. Certified organic farmers and processors pay their certifier for the service, and in some cases, pay their state agriculture programs for organic registration. These fees are on top of the fees all farmers pay for various government services and enforcement actions. It isn't fair that a fee to pay for additional inspections, etc., should be the same for a farmer who is working 2 acres of land as the agri-business is working 25,000 acres of land.
- Enforce existing laws first. The FDA and USDA and their state counterparts have adequate rules already in place to address food safety. Keeping up with existing inspection protocols and enforcing violations that already exist will go a long way to ensure that our future food supply is safe.
- Base any new regulations on scientifically based research and target new research to the core issues. While it is important to look at the entire food production when determining how to regulate food safety, research emphasis should be placed on areas where there is the most potential for contamination. For example, one area of research – that creating totally sterile farming and food production systems leads to improved food safety – has been called into question. Further research is necessary on this subject, and other research areas must be also be emphasized and pursued.
- Lastly, organic production has seven characteristics that make it unique and therefore, a good model for Congress to use when creating individual on-farm plans:
 - Organic System Plans – where all aspects of the farm are explained. Good tool to elaborate food safety protocols
 - Traceability – certified organic producers and processors can trace their products from point of sale back to the field of origin, and are required to keep extensive records on this aspect. Many of the traceability requirements in new legislation would not be necessary in an organic system, and would be so costly that they would put many small farmers out of business.
 - Sanitation – organic production permits anti-microbial steps to be used to lower pathogen contamination (pasteurization, equipment sanitation, steam sterilization are examples)

- Manure and compost – no raw manure is used in organic systems, without an extended 90-day or 120-day waiting period between application and harvest. Property made compost increases microbial diversity in the soil, which leads to the soil's ability to “fight off” the bad microbes.
- Microbial balance – see above. Beneficial microbes keep soil in balance, providing good nutrition to crops and keeping pathogens and microbes in check.
- Biodiversity – creating a more diverse eco-system by adding hedgerows, vegetative buffers, and diversified cropping systems will improve microbial balance, water filtration, and produce more nutritional food.
- Livestock – Organic regulations do not allow confined feeding operations, considered to be one of the primary sources of E. coli 0157. Nor do they allow routine use of antibiotics that can lead to E. coli strains that are antibiotic resistant.

We will use this platform to inform the comments we make on the FDA proposed regulations as they are promulgated.