



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



July 15, 2009

To: Members, House Committee on Agriculture (list attached)

SENT BY FAX

From: Claudia Reid, Policy and Program Director, CCOF

Re: HR 2749

CCOF (California Certified Organic Farmers) is one of the largest and oldest organic certifiers in North America. We certify more than 2200 members to the National Organic Program, with members in 39 states and 3 other countries. Since 1973 we have advanced the integrity of the organic label, helping our clients provide healthful, local and fresh produce, as well as high-quality processed goods, to consumers.

We commend Congress' efforts to tackle the difficult issue of food safety and feel strongly that the US food system needs to be much safer.

We provide the following input for your use in the House Agriculture Committee meeting scheduled for Thursday, July 16, 2009. We are distressed that although agribusiness, large farm organizations and the food industry will be represented at that hearing, there is apparently only one organic farmer on the agenda, who does not represent any of the trade associations or certifiers throughout the country that have been watching the development of HR 2749 and other food safety proposals with extreme interest and concern. Organic is the fastest sector of the US food system, so it is indeed a troublesome oversight that our industry is not allowed to participate in this hearing with a larger presence than just one farmer.

Following are questions and remarks we would make, were we given the opportunity to testify at the hearing:

- Why are all food "facilities" under this proposed law, even those that gross less than \$500,000 annually, subject to the same registration fee of \$500/year? This is a regressive tax that disproportionately impacts smaller producers. Why is the proposed law written so that a small processor must pay the same fee as the largest facilities in the US food system? It would be simple to create a sliding scale for the fee assessment, so that everyone participates in funding the provisions of HR 2749 but at a rate that they can all afford. America's "small" farms are growing at the fastest rate, and legislation such as HR 2749 could seriously jeopardize the diminishing profit margins of our farms, both small and mid-size, to the point where only large-scale agribusiness farming and processing are practiced in this country.
- Current provisions in HR 2749 could actually encourage farmers to remove important wildlife habitat and buffer strips that protect streams and rivers, in an effort to create the desired "sterile" on-farm environment, free of bacteria. There is evidence that

creating a “sterile” farming environment will NOT decrease food-borne illness outbreaks, because the illnesses are not caused by those organisms present in a biologically diverse environment. It is crucial that our food safety laws harmonize with environmental protection, and with the National Organic Program rule which requires farmers to maintain and improve the biodiversity and natural resource base of their operations. HR 2749 as currently written could be in direct conflict with the National Organic Program rule. We encourage you and your staff to work with CCOF and other organic organizations to make sure this does not happen. HR 2749 and other proposals must focus on the points in the food system that are creating the illness problems, not damage the organic system’s biologically integrated approach to farming.

- Currently, under the Organic Foods Protection Act of 1990, organic producers must comply with food safety standards. HR 2749 creates a second burdensome set of standards that are often duplicative of existing laws, and with significant additional administrative costs. This circumstance could actually act as a *disincentive* for farmers who might want to transition from conventional to organic. It is important for House Agriculture Committee members to realize that the organic industry can provide a model for all other farmers and processors, in terms of ability to trace products, keep accurate and complete records, and comply with strict regulations. HR 2749 and other food safety proposals should use the organic system as a template for regulation, and not create new laws and regulations that are duplicative, unnecessary and burdensome for this rapidly growing segment of American agriculture.

We appreciate your attention to our issues, and welcome the opportunity to discuss them with you. I can be reached at Claudia@ccof.org, or 916-443-6480.

This letter was faxed to the following Members of Congress:

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111th CONGRESS: HOUSE AGRICULTURE COMMITTEE

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