



THE CULTIVATOR

NEWS FROM THE CORNUCOPIA INSTITUTE

FALL 2013

Food Safety: One Size Does Not Fit All!

FDA Draft Rule Threatens Ruin of Local and Organic Family Farmers

BY WILL FANTLE

It was salmonella-contaminated peanuts that sickened hundreds across the country, and killed nine individuals, that proved the final straw finally pushing Congress into enacting sweeping new food safety legislation in the waning hours of 2010. The notorious Peanut Corporation of America was the latest agribusiness concern to engage in risky practices, negligence and/or malfeasance leading to illnesses and even death among unsuspecting consumers.

Bagged spinach, sprouts, eggs, melons and frozen berries with imported pomegranate seeds are among other foods that have been contaminated in recent years with bacterial pathogens. To address the problem, Congress tasked the Food and Drug Administration (FDA) with developing new food safety regulations when they passed the Food Safety Modernization Act (FSMA). The rules will cover not just agribusiness processors, but farmers and their crop management practices.

Farmers have historically been suspicious of the FDA, an agency with little background in the growing of food. Their fears appear to have been well grounded. The agency's draft rules, currently up for public comment, threaten to ensnare the country's best and safest farmers in a



The oceans of manure coming from the nation's livestock factory farms, such as this one in Georgia, pose one of the greatest food-contamination risks.

Not only does the FDA draft rule saddle farmers with management of risk factors beyond their control, the agency mishandles the opportunity to control root causes of systemic food safety problems.

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maze of overly burdensome mandates, testing and record-keeping requirements. These target, quite possibly, the CSA supplying your household, family farmers selling directly to your co-op or grocery store, or local

Human Testing to Prove Harm Is Unethical

EDITORIAL BY CHARLOTTE VALLAEYS

The food additive carrageenan has been shown in dozens of animal studies to cause gastrointestinal inflammation, lesions and ulcerations. Several animal studies found food-grade carrageenan to promote colon cancer.

One of the leading scientists studying the effects of food-grade carrageenan, Dr. Joanne Tobacman, has followed up on these animal studies with new research using human cell cultures, and has found carrageenan causes harm in ways similar to other “natural” poisons, like salmonella.

Apparently the ever-growing body of scientific evidence about carrageenan means little to many major corporate agribusinesses like WhiteWave Foods, makers of Horizon and Silk products. WhiteWave wants to see more research; specifically, they’d like to see experimentation with this harmful substance on humans before they take it out of their products.

In responding to customer inquiries, WhiteWave writes: “Lastly, Tobacman would need to follow through with animal **and clinical studies (human)** which are necessary to validate her findings” [emphasis added].

Toxins are tested for safety using laboratory animals for one simple reason: it is unethical to test on human beings—real people like you and me—to determine whether a food additive will make you sick or give you cancer.

Clinical trials are used to test drugs or therapies with the potential to benefit, not to hurt, people.

While this seems like an obvious statement, based on the ethical and religious premise that human life is sacred and should be protected from intentional harm, WhiteWave apparently disagrees.

Essentially, the people at WhiteWave Foods have publicly stated that they will continue to add carrageenan to their products until a scientist can point to a human being who now has a colon tumor, or a gastrointestinal lesion, or ulcerative colitis, because they had the misfortune of having volunteered for a study and were assigned to the test group that required them to consume a daily dose of carrageenan.

Clinical trials are used to test drugs or medical therapies that have a potential to *benefit* humanity. We should never use clinical trials to *cause* suffering and disease, especially when the substance in question is a food ingredient with no nutritional value.

This is truly a new low point for WhiteWave Foods.

For an in-depth report and online buyer's guide on carrageenan, visit www.cornucopia.org.



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STAFF

Mark Kastel, Codirector & Senior Farm Policy Analyst

Will Fantle, Codirector & Director of Research

Charlotte Vallaeys, Director of Farm and Food Policy

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Jim Munsch, GE Alfalfa Lawsuit Representative

THE CULTIVATOR

Elizabeth Wolf, Editor

Tim J. Hill, Newsletter Design

Special thanks to Steven McFadden and Maggie Yount

CONTACT US

P.O. Box 126, Cornucopia, WI 54827

(608) 625-2000, cultivate@cornucopia.org

www.cornucopia.org

Q: Is Organic Liberal or Conservative? A: Yes!

COMMENTARY BY MARK A. KASTEL

The organic farming movement was initially fueled by a loving collaboration between family farmers dedicated to producing food in consort with nature, shunning toxic agrichemicals and genetic engineering, and a growing subset of committed consumers who want the very best nutrition and safest possible food for their families.

As the organic “community” blossomed and grew into the \$30+ billion industry that it is today, a number of conservative think tanks, many with direct funding from Monsanto, DuPont and other interests in agrichemicals and biotechnology, challenged the propriety, and even the safety, of organic food.

For over a decade, the Hudson Institute’s father-and-son team of Dennis and Alex Avery kept up a constant barrage. Hudson listed many agribusiness funders as their donors during these attacks.

Last year some researchers at Stanford University published a study suggesting that organic wasn’t worth the premium price. Their findings contradicted studies by the USDA, Consumers Union (publisher of *Consumer Reports* magazine), and countless university researchers, internationally, who have found measurable benefits from eating organic rather than conventional foods.

At the time, Stanford (the home of the Hoover Institution, also with a history of attacking organics) firmly stated that the study was funded



“internally” rather than by agricultural or biotechnology interests. What they didn’t tell the world was that their internal funders included — you guessed it — agricultural and biotechnology interests.

The latest industry attack dog challenging organics is Mischa Popoff, a self-published author claiming to be an organic advocate and former independent certification inspector.

Mr. Popoff, who was recently booted off the conservative party ballot in British Columbia, suggests that organics is riddled with fraud, and is derived from 80% imported ingredients (there is no independent research to support either of these specious claims). He is now affiliated with Illinois’ Heartland Institute, another conservative group with a history of denigrating organics.

So if you’re keeping score it would appear that since the most prominent organizations challenging the legitimacy of the organic food and farming movement come from the conservative camp, that must mean that organics is a “liberal” movement. But I’d like to illustrate how inaccurate that conclusion would be.

Organic food cuts across all party and ideological lines. We are genetically predisposed, as a species, to care for our families by procuring the very best food.

Although some of the conservative think tanks and their agribusiness patrons might want to paint organic food as “elitist” — and even a “socialist” plot — the facts tell a different story. The organic movement is truly non-partisan.

Organic consumers are just as likely to be a loving Republican soccer mom from Westchester County as a caring Democratic parent in Park Slope, Brooklyn. Although The Cornucopia Institute’s prime constituency is family-scale organic farmers, at least 30% of our members are urban-allies. When you examine the zip codes across urban and suburban America it is clear that they represent a highly diverse cross-section of the citizenry.

Another healthy subset of Cornucopia’s members come from Amish and Mennonite communities. These folks are anything but wild-eyed radicals. And I can tell you from talking with many of our farmer-members that they hold a diverse set of political opinions from all persuasions, including a strong faction of libertarians supporting access to fresh, raw (unpasteurized) milk.

Furthermore, although the modern American organic farming movement was founded by a mix of career agriculturalists and educated *back to the land* hippies, the growth of the industry has changed that demographic mix. Today, most of the commercial-scale farms are run by multi-generation owners who switched to organics to protect their

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On Guard: Gearing Up for the Fall NOSB Meeting

Agenda for October Meeting in Louisville, Kentucky, Will be Jam-Packed

BY PAMELA COLEMAN

Loyal Cornucopia members are aware of our commitment to closely monitor the activities of the National Organic Standards Board (NOSB).

The NOSB, created by Congress, is responsible for making recommendations on all the regulations related to organic food production and processing. One of their most important legal responsibilities is to carefully review petitions for synthetic and non-organic substances to be added to the National List of Allowed and Prohibited Substances — commonly referred to as the “National List.”

The NOSB has six subcommittees: Crops; Livestock; Handling (generally covering food processing); Materials (mostly agricultural inputs); Compliance, Accreditation, and Certification (CAC); and Policy Development (managing NOSB activities). Each subcommittee regularly meets to discuss items that may be added to the agenda for the full NOSB meeting, and brief notes are posted on the USDA National Organic Program (NOP) website (www.ams.usda.gov).

At this time, all committees have a full slate of work, which means that there may not be enough time to include all items in the agenda for this meeting — especially given that the NOP, for “budgetary reasons,” has shortened the fall meeting 25%, from four days to three.

Some of the following items will be discussed and voted on at the upcoming meeting, October 22–24; others will likely be postponed for future meetings.

The **Crops** subcommittee is reviewing petitions for magnesium oxide (added to liquid fertilizers), vinasse (a by-product of sugar manu-

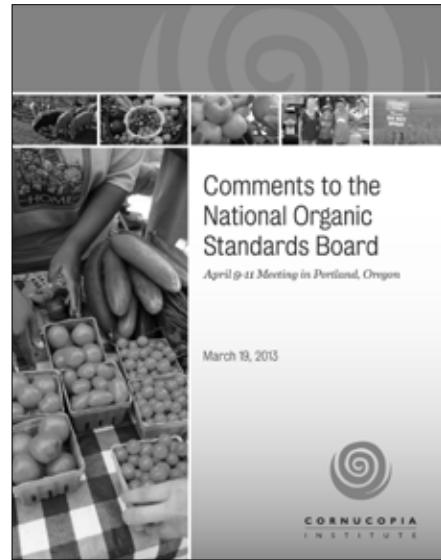
facturing, to be used as a fertilizer), and streptomycin (an antibiotic used to control disease of apples and pears), as well as five aquaculture materials. Aquaculture includes the raising of fish, other aquatic animals, and seaweeds in oceans, lakes, and closed systems. Materials for aquaculture include carbon dioxide, chlorine, micronutrients, lignin sulfonate, and vitamins.

The **Livestock** subcommittee is reviewing a petition for sodium chlorite (used as a teat dip for dairy animals), plus five aquaculture materials: chlorine, tocopherols, vitamins, trace minerals, and lignin sulfonate. There has been an ongoing discussion of the use of synthetic methionine (an amino acid) in poultry feed; the NOSB will likely present a final report on that.

The **Handling** subcommittee is reviewing petitions for the use of ammonium hydroxide and polyalkylene glycol monobutyl ether in the boiler water used to produce steam for heat-treatment of food. They also have a petition for the removal of synthetic glycerin from the National List, because the petitioner asserts that certified organic glycerin is now commercially available. The **Handling** subcommittee must review four materials slated to sunset: gellan gum (a thickening agent), marsala and sherry (fortified cooking wines), and tragacanth (an emulsifier). The sunset process, which takes place every five years for each material, removes that material from the National List, unless the NOSB votes to continue to allow its use.

The **Materials** subcommittee is working on the definition of “production aids,” a recommendation for organic research priorities, the process

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Cover design by Tim J. Hill, drafthorsestudio.com

To read Cornucopia’s public comment on NOSB agenda items, visit cornucopia.org and select **NOSB** under the **Projects** tab.

How to Participate

The National Organic Program expects to post the NOSB meeting agenda on September 3 and will accept comments for 30 days after that. To read all the proposals on the agenda, go to the NOP website (www.ams.usda.gov/nop), look under the heading **National Organic Standards Board**, and click on **Meetings**. In the drop-down list, select October 22–24, 2013.

To submit comments, go to the NOP website, look in the bottom right of the page, under **Open for Public Comment**, and click the link **Submit Comments**, which connects to the portal regulations.gov.

If you’d like to join Cornucopia as a **citizen lobbyist** in Louisville, contact cultivate@cornucopia.org.

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for technical reviews of petitioned materials, the response to confidential business information in petitions, and the use of technical advisory boards and working groups to supply information to the NOSB.

The **Compliance, Accreditation, and Certification** (CAC) subcommittee is discussing proposals on voluntary retail certification; how certifiers verify the practices farmers use to prevent insect and disease outbreaks; and the NOP's recent initiative, *Sound and Sensible Certification*.

The **Policy** subcommittee is reviewing the Material Initiation

The ad hoc GMO subcommittee is working on seed purity — avoiding contamination of seed by GE DNA.

Policy, which outlines the procedure for NOSB members themselves to request review of a material. They are also updating the NOSB's Policy and Procedures Manual.

In addition to the above permanent subcommittees, there is an ad hoc **GMO** subcommittee. They are working on seed purity — avoiding the contamination of organic seed with genetically engineered DNA — and the terminology to define excluded

methods (genetic engineering) in plant breeding.

With the NOSB meeting still a few weeks away, Cornucopia staff is gearing up to read all proposals and conduct our own background research. This allows us to prepare an unbiased, independent evaluation with detailed written comments on each petition, proposal, or discussion document on the NOSB fall meeting agenda. This investment is viewed as a valuable resource by many NOSB members

As The Cornucopia Institute constantly remains aware of the NOSB issues, educates consumers, and advocates high organic standards, we act as a true "watchdog" for the organic industry. ☺

Aquaculture Standards: Something Fishy Going On?

Eating organically can be a dilemma for seafood lovers. There are no USDA certified organic fish, shrimp, or oysters, because the National Organic Program (NOP) has not established standards for aquaculture. The NOSB approved final recommendations for aquaculture in 2008, but they have not yet been passed into law.

Ideally, organic regulations would encourage sustainable fish farming. A closed system, raising herbivorous fish on organic feed and recycling their wastes, could offer local organic fish.

Unfortunately, it appears likely that the USDA's NOP may allow fish farming that is patterned on the conventional system — open net pens that float in the ocean and allow feces to pollute the water. These conventional systems have seriously harmed marine habitats near the fish farms.

In addition, many of the farmed fish are salmon — a carnivorous fish that migrates into rivers to spawn. Farmed fish are fed soybeans (an unnatural food for fish), which requires many nutrients to be added to their food. Salmon are also fed small fish, which depletes fish stocks.

At Cornucopia, we have grave concerns about the environmental impacts of large-scale fish farming in open waters. We also have concerns that cultivation of carnivorous fish, such



Conventional fish farms can seriously harm nearby marine habitats. Unfortunately, organic regulations may allow fish farming patterned on the conventional system.

as salmon, may simply be too damaging to the environment to ever be labeled as organic.

Despite the lack of aquaculture standards, the NOP formally requested that the NOSB review aquaculture materials. These petitions are currently under review and will be open for public comments (probably by September 3) and up for vote at the fall NOSB meeting.

The Cornucopia Institute will prepare comprehensive analysis of this and other petitioned materials. We hope that you'll join us in voicing your opinion to the NOP.

Watch Cornucopia's website, www.cornucopia.org, for analysis of the NOSB fall meeting agenda items.

Busting the “Organic Is Expensive” Myth

The Cost of Organic Food Is Worth It and—Surprise—it’s Not Always Higher

BY CHARLOTTE VALLAEYS

Orgetic food is too expensive.” It’s a complaint we, as organic farmers and advocates, hear all too often. And we’ve practiced and often repeated our defense of organic food’s higher price tag: it’s worth every extra penny in terms of a long-term investment in our health and in protecting the environment. When people complain of the high price of organic foods, farmer Joel Salatin likes to respond: “Have you priced cancer lately?”

But we shouldn’t stop at countering the myth that organic food is “too expensive”; we must also examine the assumption that organic food actually *is* more expensive than conventional food. It’s simply not as black-and-white as many people assume.

Yes, I readily admit that in any supermarket that offers organic strawberries, they will be pricier than the conventional. And a box of organic cereal will definitely carry a higher price tag than the cheap conventional store-brand version.

But it is also entirely possible, without much effort, to fill a shopping cart with a week’s worth of conventional foods and pay *more* than you would for a week’s worth of organic food.

With two young sons (Liam is 5 and Kai is 3), I buy only organic food for my family. I shop with an organic gatekeeper: Liam sits in the cart and checks every incoming item for the USDA Organic seal. Anything without it he sends back to the shelf.

I also buy as much *local* certified organic food as possible and carefully choose the brands that I can trust with the important job of providing nourishment for my children. So I assumed that our food budget was much higher than that of families who do

not share our commitment to organics.

After doing some quick math in supermarket aisles, I discovered that this is not necessarily the case.

Liam’s lunchbox provides a perfect example. On hectic weekday mornings, I admit that “convenience foods” like a Kraft Lunchable® box—no preparation and no clean-up required—can be quite alluring. But the ingredients list of a Lunchable® box reads like a who’s who of cheap and unhealthy items, including high fructose corn syrup, partially hydrogenated oils, carrageenan, artificial colors, chemical preservatives like calcium disodium EDTA, and lots of salt and sugar.

Clearly, Kraft is not interested in healthy and wholesome foods to support my sons’ well-being, but in cheap ingredients with a long shelf life and addictive taste that augment the corporation’s bottom line. I always figured that the extra cost and extra effort of peeling organic carrots and slicing organic apples were worth it. I would add that medical issues down the road cost time as well as money, and I would gladly add five minutes to my morning routine in exchange for safe and wholesome food.

Then I compared the cost of Liam’s homemade lunchbox, filled with organic foods, with that of a typical Kraft’s Lunchable, which seems to be perpetually on sale, at \$2.50 per box, at my local Stop ‘n Shop. As it turns out, the homemade lunch (containing



NextGen organic watchdogs: Charlotte’s sons Kai, 3, and Liam, 5, hunt for the organic label when shopping with mom.

organic bread with organic hummus, organic cheddar cheese, an organic apple, organic carrots and organic raisins) costs less than a Lunchable (a typical box contains crackers or flatbread, Oscar Mayer ham, American cheese, applesauce, a cookie or a bag of candy, and a juice box).

Then I repeated the exercise with one of Kai’s favorite foods: yogurt. I was certain that our commitment to buy only the highest quality yogurt was costing us more money. I buy whole milk Butterworks Farm yogurt, which is highly rated on Cornucopia’s organic dairy scorecard. Not only is it organic, it’s from organic pioneers Jack and Anne Lazor’s farm in Vermont (Anne was one of Cornucopia’s founding Board members). They graze their Jersey cows and sweeten their yogurt with organic maple syrup. There are no fillers like pectin or “natural flavors” or any other ingredients with dubious pedigrees.

I always felt justified about my decision to pay extra for this wonderful yogurt, until I did a price comparison. On a price-per-ounce basis, I pay less

Go figure: organic maple-syrup-sweetened yogurt from grassfed Jersey cow milk costs less than artificially flavored, chemically colored and carrageenan-stabilized yogurt in a tube.

for Butterworks Farm yogurt than I would for any of the major food corporations' yogurt products marketed to children, including Yoplait's Go-Gurt and Dannon's Danimals.

Go figure: organic maple-syrup-sweetened yogurt from grassfed Jersey cow milk costs *less* than artificially flavored, chemically colored and carrageenan-stabilized yogurt in a tube.

I understand that parents living near the poverty level are not buying Go-Gurts or Lunchables either, because when money is tight, the conventional store-brand foods in bulk are definitely the least expensive. Organic foods are not cheaper than the cheapest conventional foods—and that's a fact. But I have found conventional foods that are pricier than organic foods in nearly every corner and aisle of the supermarket.

While the complaint that "organic food is too expensive" is commonplace, when have we ever heard people point out the high cost of Go-Gurts and Lunchables?

It's time to shift the discourse, beginning with the real numbers: on a price-per-ounce basis, heavily advertised brand-name foods from multinational corporations like Kraft and General Mills are often more expensive than wholesome organic equivalents that do not advertise and may require the occasional scooping, peeling or slicing.

It is the Go-Gurts and the Lunchables that should be the target of mainstream criticism—for being unhealthy *and* expensive—not the

wonderful organic foods produced by responsible stewards of the land. Organic consumers know they are getting something in return: protection from toxic pesticide residues, antibiotics or synthetic growth hormones, genetically engineered ingredients, toxic solvents and fumigants. The price premium also supports sound environmental stewardship and humane animal husbandry practices. It is all well worth the extra cost.

What are consumers getting in return for Lunchables and Go-Gurts, for Betty Crocker cake mixes and Lean Cuisine microwaveable dinners, for cans of Breakfast Essentials? Rather than paying more to avoid toxic residues and chemical ingredients, shoppers are shelling out high food prices to buy convenience.

But the cost of preparing food in a factory so we don't have to do it at home is not the only reason for the high prices of conventional foods. I found many conventional products that cost more than the exact same organic product—with no difference in preparation or packaging.

If not convenience, what are consumers paying extra for? In some cases, the word "deluxe" or "natural" on the label shot up the price significantly, even though these gimmicky marketing tools mean nothing legally. The foods are produced with toxic agrochemicals and often with GMOs and other materials that nobody in their right mind would ever consider "natural." For example, conventional Kashi cereal (owned by Kellogg) often costs more than Nature's Path organic cereal. And where does the extra money spent on "natural" and "deluxe" foods end up? Not to support responsible "natural" or "deluxe" farmers, but to line the pockets of multinational corporations with clever marketing departments and ad agencies.

Orange juice at Whole Foods is another good example. Uncle Matt's orange juice, from organic oranges

grown in Florida, costs less than the similarly sized containers of Odwalla orange juice. Coca-Cola owns Odwalla, which packages conventional, pesticide-sprayed oranges in a fancy package and then charges a hefty premium.

I also saw broccoli florets in the freezer of Stop 'n Shop that were labeled "Deluxe" and cost more than the exact same certified organic variety. Conventional pasta sauce with fancy brand names often costs more than organic versions. Chobani yogurt costs more than almost any traditional-style organic yogurt. Yes, Greek-style costs more because it requires more milk to produce. But their milk comes from cows in feed-lots given GMO corn and soy grown with pesticides, which simply does not justify a price tag higher than organic versions.

It is the Go-Gurts and the Lunchables that should be the target of mainstream criticism — for being unhealthy and expensive.

Organic is expensive? Organic is "elitist"? It's time to direct the outrage where it belongs. Corporations that buy the cheapest crops—subsidized by taxpayer dollars, sprayed with pesticides, often genetically engineered—spend money on pretty packages and advertisements, and then profiteer at the expense of consumer confusion.

Meanwhile, the bees are dying, animals are abused on factory farms, and the land is poisoned by conventional agriculture.

We have a collective responsibility to ourselves, to the hard-working people who produce our food, to the animals we raise for our nourishment, and to the Earth to be discerning shoppers. We owe it to ourselves and to society to do everything we can to support organic agriculture. ☺

FOOD SAFETY

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producers selling at your farmers market.

"Unless we act now," says Cornucopia Institute Codirector Mark Kastel, "the FDA's proposed rules have the very real potential to drive some of the safest local and organic farms out of business." Adds Kastel: "Concerned consumers and farmers need to stand up and deluge the FDA with critical feedback during the public comment period that runs until November 15."

The FDA badly misfires at several points in their draft food safety rules. Not only does the agency saddle farmers with management of risk factors beyond their control, but the FDA mishandles the opportunity to control systemic food safety problems.

Specific, high-risk crops, grown in distinct parts of the country, or imported, and then processed for

sale, are the genesis of 90% of food contamination outbreaks. Investigative evidence reveals that thousands of individual illnesses come from food processing practices employed with the sale and consumption of fresh-cut/bagged salads, greens and sprouts—not from farming. The FDA could have developed special rules for the riskier fresh-cut produce market, tying production practices with processing. Yet the agency fails to connect the dots and instead applies expensive and extensive regulations to all produce farmers regardless of scale, locale and crops grown.

The draft rules likewise fail to regulate the seeds used for sprouts. There have been definitive tracebacks from sprout outbreaks to seed lots for over 15 years. The FDA recklessly ignores this.

The mountains of manure rising on the nation's giant factory-farm animal feedlots are quite possibly the most important reservoir for



Photos by Maggie Yount, emwphyphotography.com

Very few cases of food contamination have been reported from the sale of local produce, yet farmers markets are increasingly targets of FDA action.

some of the most dangerous pathogens contaminating the food chain. Supercharged and deadly strains of bacteria, such as E. coli O157:H7, are widely found in feedlot manure. This particular E. coli was the cause of the food poisoning outbreak associated with bagged spinach a few years ago.

Food safety pathogens escape from the factory farms via ground and surface water and airborne dust particles, and contaminate the surrounding rural countryside, including nearby fruit and vegetable growers. Absent from the FDA's draft rules are actions aimed at controlling release of bacterial contamination at the source on the nation's giant animal factory farms. Instead, the responsibility is transferred to users of irrigation water who are supposed to test for contaminants.

In organic agriculture, the use of animal manure is regulated or it must be composted prior to incorporation back into the soil as a key fertility



More Scrambled Eggs

In addition to the FDA's produce food safety proposals, the agency has issued a "guidance" related to their regulations to prevent salmonella contamination of eggs.

Just as imported and factory farm produce might be dangerous and warrant regulatory oversight, the 2010 salmonella outbreak in Iowa, shone a spotlight on industrial-scale egg houses confining tens of thousands of hens in filthy and dangerous conditions.

The salmonella outbreak led to this new egg guidance. And despite scientific evidence tying higher rates of pathogenic contamination to older, massive factory farms with caged production/forced molting (banned in organics), the FDA is zeroing in on flocks with outdoor access (certified organic).

According to Cornucopia's Kastel, the new guidance "will make it difficult, expensive, and maybe even impossible to have medium-sized flocks of birds outside. At the same time, the FDA has colluded with the USDA's National Organic Program to say that tiny 'porches,' holding only about 1% to 2% of up to 100,000 birds in a factory henhouse, will now legally constitute outdoor access."

Check out Cornucopia's scorecard rating brands of organic eggs at www.cornucopia.org/scorecards.

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Strangling Local Foods and Farms

"The FDA will be able to target small farms one by one and put them out of business, with little to no recourse for the farmers."

—Judith McGreary, Farm and Ranch Freedom Alliance

the agency can, without any due process and record keeping that larger operations must maintain.

Says Judith McGreary, of the Farm and Ranch Freedom Alliance and a Cornucopia policy advisor: "In practical terms, the FDA will be able to target small farms one by one and put them out of business, with little to no recourse for the farmers."

For directions on submitting public comments to the FDA, due November 15, visit www.cornucopia.org/foodsafety. Tell the FDA to protect the nation's best and safest farms, and target regulation where it's needed most: at high-risk, industrial-scale agricultural operations.

agent. The heat generated over time in proper composting cooks fecal bacteria like E. coli and salmonella in animal manures.

Human wastes, part of the sludge generated by urban waste treatment facilities, are banned from use in organic food production. Heavy metals found in sludge from urban industrial activities and pathogens like human viruses (not present in animal manures) led to the organic prohibition. Rather than follow organic practices, the FDA proposes to liberalize the use of sludge in fresh produce production and opens the door to domestic and imported foods grown with sewage sludge.

"Only an idiot would not be concerned with food safety," observes Tom Willey, a veteran California organic produce farmer and supplier to hundreds of subscribers to his family's Community Supported Agriculture operation. Willey has implemented a number of food safety protocols, including an employee food safety program and pathogen testing of their

The FDA freely acknowledges that the farm cost of implementing their proposed rules will drive some producers out of business. Record keeping, testing protocols, and the need for an auditor will cost thousands of dollars. The FDA estimates an approximate annual cost of \$4,700 for very small farms and \$13,000 for medium-sized operations.

When crafting the Food Safety Modernization Act (FSMA), Congress, under pressure from family farm advocates, exempted local farmers doing less than \$500,000 worth of business with the "Tester Amendment." The FDA, however, still exercises great power over food safety. If a small owner-managed farm, delivering directly to consumers or local stores, does anything the FDA doesn't like,

almost immediately force small farms to comply with the same expensive testing and record keeping that larger operations must maintain.

Says Judith McGreary, of the Farm and Ranch Freedom Alliance and a Cornucopia policy advisor: "In practical terms, the FDA will be able to target small farms one by one and put them out of business, with little to no recourse for the farmers."

Investigative evidence reveals that thousands of individual illnesses come from food processing practices employed with the sale of fresh-cut/bagged salads, greens and sprouts – not from farming.

compost. They also quit making salad mixes because of the inherent risks.

Willey, a Cornucopia policy advisor, says the "increasingly virulent organisms contaminating our produce from time to time are mutant creatures introduced into the larger environment from confined industrial animal operations across the American countryside." He expresses puzzlement at the unwillingness of his fellow vegetable farmers to address the threat posed by factory farm feedlots.

Willey cites his 30-year history pursuing the knowledge and art of biologically intensive soil management. A handful of his soil harbors nearly

six billion living organisms, and greatly contributes to the nutrition and taste of his farm's produce. In addition, he explains that the robust soil biology is a less friendly environment for human pathogens by "excluding or more quickly eliminating them."

The Cornucopia Institute has established a web page (www.cornucopia.org/foodsafety) detailing how farmers and consumers can take action on the FDA's produce and egg regulations.

Concludes Kastel: "You and I have chosen to be part of an alternative to the industrial agricultural paradigm that has brought us food contaminated with toxic agrichemicals and drugs, a precipitous drop in the nutritional level of what we are eating, wholesale damage to the environment, and the exploitation of the hard-working families producing our food. Please step up and help us defend and protect this alternative in the marketplace. It is a model of health, stewardship, and justice worth fighting for." ☀

LIBERAL OR CONSERVATIVE?

Continued from page 3

land and families from exposure to toxic and carcinogenic chemicals and because it afforded a better quality of life.

Secretary of Agriculture Earl Butz popularized the Nixon era's message to farmers: "Get big or get out." For over two decades organics has offered a third option for operating a family farm. It's been good for families and rural communities.

So, although some of the conservative think tanks and their agribusiness patrons might want to paint organic food as "elitist" and even a "socialist" plot, the facts belie this representation.

In our capital, Democratic Senator Patrick Leahy might be the most prominent organic advocate in Congress. More recently he has been joined by certified organic farmer/ranchers Senator Jon Tester (D-MT) and Rep. Chellie Pingree (D-ME). I was delighted by the bipartisan support for organics when I recently testi-

When it comes to length and overall quality of life, infant mortality, and chronic disease, U.S. statistics pale in comparison to those of other affluent, industrialized countries. Many families, municipalities, and governments are going broke due to out-of-control healthcare spending. We can't afford not to eat organic food.

fied before a House Foreign Affairs Subcommittee regarding Chinese imports. Subcommittee member Steve Stockman, the self-proclaimed "most conservative congressman in Texas," underscored his support noting that he and his family eat organic food.

Everyone deserves safe and healthy food. In the United States, we have the cheapest food in the world. We also have, by multiples, the most expensive health care.

And how are we faring through this dynamic? When it comes to length of life, infant mortality, chronic disease, and overall quality of life, U.S. statistics pale in comparison to

those of other affluent, industrialized countries. Many families, municipalities, states and the federal government are quickly going broke due to out-of-control healthcare spending. We can't afford *not* to eat organic food.

It is not elitist, nor is it partisan or ideological, to want the very best food for your family. Whether it's from their local farmers market, CSA delivery, member-owned co-op grocer, supermarket, or Walmart, consumers are voting in the marketplace in favor of organics. ☺



Photo by Tim Evans

Codirector Mark Kastel

Cornucopia Transitions: Farm Policy Position Opens



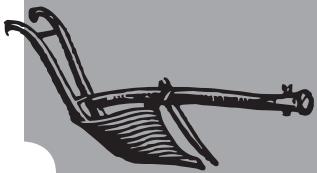
Longtime policy staff member Charlotte Vallaey

The entire board and staff wishes great success to Policy Director Charlotte Vallaey, who has taken a new position with a longtime ally of The Cornucopia Institute, the Consumers Union (publisher of *Consumer Reports* magazine). Charlotte joined Cornucopia just after graduating with a master's degree from Tufts University's Friedman School of Nutrition Science and Policy. She is now a respected, seasoned professional who has been a well-loved and trusted colleague for over six years. Charlotte will remain an important ally in our work protecting the organic food movement.

Cornucopia now seeks an individual to join our team as Farm Policy Analyst, conducting research and investigations into organic and sustainable food and farming production practices. This staff member will also be involved with networking and communicating with farmers, consumers and other organizations. We are seeking an individual with a strong background in farm policy, nutrient-dense food, research, writing, organizing and social media. A heartfelt passion for protecting the environment, the good food movement, humane livestock husbandry and social/economic justice for family farmers is imperative.

Cornucopia is formally based in Wisconsin, but staff members are "virtually officed" across the country. Because of this, work with Cornucopia is possible from any U.S. locale.

To view the Farm Policy Analyst job description, visit www.cornucopia.org and click on Jobs at the bottom of the home page.



THE CORNUCOPIA FARMER PROFILE

Manna Farms: More than “Natural”

Cows have four stomachs for a reason. There is purpose behind the snout of a hog. Squash, corn, tomatoes—they grow where they do, when they do, how they do, by design.

By Divine design, Dominic Marchese would say. This deeply spiritual, cigar-chomping cattleman raises beef as he believes, God intended: 100% grassfed, calves never separated from their mothers, birth to processing off the same rotating pastures.

The proprietor of Manna Farms, near Farmdale, Ohio, didn't come from a farming background, but an encounter with his wife's Bible study class planted the seed. "I've come to find out it's instilled in every man, the desire or need to grow something. I think that came from our Creator," Marchese says. In 1972 he bought 131 acres of bare ground and started growing grain and dairying.

After milking cows for nearly 20 years, Marchese started a beef herd. "It was like dying and going to heaven," he recalls. Beginning with registered shorthorn, in 1997 he introduced to the farm Piedmontese, an Italian breed he discovered from nearby Amish farmers who sold the meat to local hospitals. Famous for its "heart-healthy" meat, the Piedmontese is the only cattle breed known to carry a gene that increases tenderness and reduces fat—up to half that of skinless chicken. It cooks faster than conventional beef, too.

From 1973 to '75 Marchese used herbicides on his farm but never felt right about it. "I started reading Rodale, *Mother Earth*—of course, I was the nutcase in the neighborhood. They'd laugh at my corn because it had weeds in it," he recalls. "Spraying just didn't seem right when all you had to do was rotate your crops rather than kill all the microbes in the soil." Manna Farms has been certified organic since 1976 and solely grassfed since 1999.

As the organic market grew, challenges followed opportunities. Marchese must compete with "natural" beef producers that do not—and legally need not—verify their claims. "They might still be spraying Roundup around



Holy cow! The Piedmontese breed, originating from the Italian Alps, is leaner than chicken.

their fences, giving their calves antibiotics, using GMO feed—who's going to know?" Marchese asks. Not consumers, who nevertheless will pay nearly as much for "natural" as for organic.

Yet Marchese's costs are significantly higher. While conventional producers process their cattle at a standard, nearby slaughterhouse, Manna Farms absorbs \$250 each trip to transport live cows to a certified organic processing facility five counties away.

Organic feed is another huge expense—especially when you have up to 60 head and your calves stay a full two years with their mothers, as Marchese's do. That's 24 months to market, as opposed to just 14 to 18 for conventional cattle.

Breed is an often overlooked factor in organic livestock production; factory farm breeds simply cannot be expected to perform as well in organics.

Then there's competition from organic imports from Uruguay, Argentina and other distant countries. Astonishingly, because of price manipulation this beef costs American consumers—even Marchese's neighbors—less than the local, premium products of Manna Farms.

Because of these dubious marketplace pressures, Marchese favors regulatory absolutes in beef production. "How can you be in between?" he asks. "You're either certified organic or you're not. All they need to do is get rid of the word 'natural.' The government could fix this but they don't."

It took many years for organic pioneers like Manna Farms to create a market. Now there's so much demand for grassfed certified organic beef Marchese has a waiting list. "I sell no more than 18 head a year," he explains. Most of his customers are referrals from a local CSA who buy quarters and halves. In addition he sells meat to four restaurants and prepackaged ground beef direct on the farm.

To meet growing consumer demand, Marchese is trying to establish an organic beef producers cooperative in the area. "I think many would like to farm organically but they're afraid of being ridiculed," he reflects, "or they think they have to do the *bigger is better*." It is a long process. "Grassfed takes years to prepare. You can't just jump into it."

But Manna Farms' reason for being goes far beyond profitability: "I've never watched a U-Haul follow a hearse," says Marchese. "You can't take it with you. When you're certified organic, it's as holistic as possible."

—ELIZABETH WOLF

Photos by Angela Marchese Thomas



MANNA FARMS
Farmdale, Ohio
www.mannafarms.com
(330) 924-5200





C O R N U C O P I A
I N S T I T U T E

Hunting (and Pecking) for Poultry Brands



Photo by Maggie Yount, emwphyphotography.com

Cornucopia is creating a new product scorecard rating brands of organic chicken. You can help us separate “organic” factory farm operators from the real McCoy by letting us know what brands of certified organic chicken are sold at your local retail stores, co-ops, and farmers markets. Email brand name(s), certifier, distributor, and store name and location to chicken@cornucopia.org.

In related news: recent FDA guidance could place an onerous burden on farmers who raise true free-range chickens. See cover story for details.

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Eyes on Washington GMO Vote

After the narrow defeat last November of the statewide vote in California to require the labeling of foods containing genetically engineered ingredients, supporters of food transparency have brought the issue to numerous other states. Connecticut and Maine have adopted GMO labeling laws, contingent on nearby states adopting a similar requirement. And in Washington state, food activists are gearing up for a vote this fall on GMO labeling legislation by all state residents.

Known as I-522, the pending state vote has been attracting considerable attention from industry observers. Monsanto and other giant biotech corporations, along with the Grocery Manufacturers Association (a lobbying group for the nation's biggest food manufacturers and retailers), have been pouring hundreds of thousands of dollars into a PR campaign aimed at thwarting a pro-labeling vote.

But a vigorous and well-organized campaign in favor of GMO food labeling has arisen in the state. The Yes on 522 committee is one of several organizations actively engaging and educating the public on the upcoming vote. A number of organic food and natural products manufacturers and retailers have also stepped up to counter the financial might of the biotech companies. In fact, as of this writing, the supporters of GMO food labeling have actually raised more money than opponents.

Cornucopia has created infographics and detailed information revealing what companies support or oppose GMO food labeling. By knowing where the makers of various food brands stand on the issue, knowledgeable consumers can match their marketplace food-purchasing decisions with their core values. Check Cornucopia's website, www.cornucopia.org, for the latest information.



—WILL FANTLE