How To Join Audio

*You must enter your attendee ID # when you call into the teleconference to ‘raise your hand’, be unmuted, and participate in the discussion.*
Instructions

• All participants are muted.
  – To ask a question or make a comment, please ‘raise your hand’ using the small button on the right hand panel
  – We may not get around to all comments/questions, BUT you may leave additional comments in the comment box to be compiled after the session

• This session is being recorded.

• Notes will be circulated after the meeting.
Agenda

• Survey review
• Input for National need of T-the-T and Grower Trainings
• Update on Environmental Impact Statement for Produce Rule
• PSA Update
• Questions on Traceability
Input for Training Needs

• Quick 4 question survey:
  – Which organizations your growers interact with/belong
  – How many Train the Trainer courses you think need to be offered in your area
  – How many grower training courses you will need to offer in your area

• Shouldn’t take more than 5 minutes! Will send in e-mail post-meeting today

https://cornell.qualtrics.com/SE/?SID=SV_aWXj3O7BkGgAD65
Environmental Impact Statement
Proposed Produce Rule

• Comments due by April 18, 2014
• Public meeting held April 4th
• Will send out recording when available
• Other comments from FDA staff?
### States Represented in Survey (20)

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<thead>
<tr>
<th>State</th>
<th>Count</th>
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<tbody>
<tr>
<td>Alabama</td>
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<td>Alaska</td>
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<tr>
<td>California</td>
<td>3</td>
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<td>Colorado</td>
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<td>Delaware</td>
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<td>Iowa</td>
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<td>Vermont</td>
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Soil Amendment Survey Questions
How many produce farms do you work with that use raw manure or treated compost every year?

- 1-5 farms: 3 farms
- 6-10 farms: 5 farms
- 11-15 farms: 4 farms
- 16-20 farms: 3 farms
- 21-26 farms: 1 farm
- 26 or more farms: 16 farms
Of the farms you work with who may be impacted by the proposed soil provision of the produce rule, can you estimate the number of acres they may have in fruit and vegetable production?

**Farm Sizes Impacted**

- 6-10 acres: 18
- 11-50 acres: 22
- 51-100 acres: 13
- 101-500 acres: 9
- 501-1000 acres: 2
- 1000+ acres: 2
Of the farms you work with, can you estimate what percent are considered organic growers?

<table>
<thead>
<tr>
<th>Percentage Range</th>
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<tr>
<td>0-10%</td>
<td>14</td>
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<tr>
<td>11-25%</td>
<td>8</td>
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<tr>
<td>26-50%</td>
<td>6</td>
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<tr>
<td>51-75%</td>
<td>3</td>
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<tr>
<td>76-100%</td>
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</table>
What is the primary reason for using manure or compost on the farm?

- Need for disposal (i.e. animal operation co-located): 61%
- Need for organic certification: 39%
- Cost: 39%
- Other, please specify: 9%

Other:
- Not necessarily superior, but it is added for some N and organic matter
- Low organic matter soils, with low pH and low buffering capacity
- Reasons are totally economic
For soil amendments, are the farms you work with using:

<table>
<thead>
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<th>Option</th>
<th>Count</th>
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<tbody>
<tr>
<td>Combination of compost with other nitrogen sources</td>
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</tr>
<tr>
<td>Combination of raw manure with other nitrogen sources</td>
<td>18</td>
</tr>
<tr>
<td>Other nitrogen source (not manure or compost), please specify:</td>
<td>17</td>
</tr>
<tr>
<td>Combination of raw manure and compost</td>
<td>18</td>
</tr>
<tr>
<td>Only compost</td>
<td>12</td>
</tr>
<tr>
<td>Only raw manure</td>
<td>8</td>
</tr>
</tbody>
</table>

Other:
- ‘Aged’ manures
- Cover crops
- Feather meal
- Fish waste
- Urea, liquid nitrogen
- Legumes
Do you think raw manure is a critical source of nitrogen on produce farms?

Comments:
- Hard to say without doing more research
- Critical source of phosphorus and potassium
- On the farm, yes, but not critical to apply it directly to produce fields
- High in salt, other higher N alternatives are available.

No, 16
Yes, 16
What are your thoughts on raw manure use?

Comments:
• If used properly, is a crucial source of nutrients and improves soil tilth (6)
• Bad choice for food safety (4)
• Good choice when proper compost and application methods are used (3)
• Disposal: It needs to go somewhere – and not necessarily into a landfill (3)
• The issue of ‘aged’ manure is concerning (3)
• Convenient and available for farms to use (3)
• Less desirable because of run-off (2)
• Cheap (2)
• Depends on crops grown and handling methods
• Recycling nutrients reduces carbon footprint
• Reduces production costs
Are there any limitations to using alternative sources of nitrogen (i.e. not manure or compost)?

Comments:
- Purchase/transport of alternative sources is cost prohibitive
- It doesn’t build organic matter
- Need to follow NOP requirements

Yes, 31%
No, 69%
How frequently are the growers you work with using alternative nitrogen supplements (i.e. not manure or compost)?

- Not using: 3%
- More than once per year: 3%
- Once per year: 7%
- Once per growing season: 20%
- Other: 23%
- More than once per growing season: 43%

Comments:
- Varies from farm to farm
- Not sure
- Varies greatly depending on crop needs and soil analysis
If you work with farms who are using animal manures or composts, what is the primary animal species of origin?

Other:
- Fish waste
- Turkey

Amendment Consistency:
- Solid: 30
- Liquid: 6
- Other: 2

Other: 5
Pig: 4
Other fowl: 2
Vermicompost: 1
Sheep/goat: 6
Horse: 13
Chicken: 20
Cattle: 22
Is the compost or manure used on the farms you work with:

- Comes from some other source, please specify: 8
- Treated at a commercial facility: 14
- Purchased from another farm: 22
- Produced by farm animals on-site: 26

Other:
- Horse stables
- Garden suppliers
- Trucked in
- Free from another farm
What do you feel will be the impacts of the required time periods between application of biological soil amendments and harvest of fresh produce as outlined in the proposed in the produce rule?

Comments:
- Will severely limits its’ use
- Change their application practices (fall rather than spring)
- Will result in less health/productive trees
- Storage capacity will be a major issue
- Will force many to switch to commercial fertilizers
- 120 is do-able, 270 is a burden
- Would reduce vegetable acres by 50% or force growers to grow illegally
- Added complexity may force growers to opt out or not comply
- Cost of production will rise, soil productivity will decline
- More data on pathogen decline over time is needed!
- Most will not have sufficient acreage in forages and grains to apply
- Growers will need to plan grazing and crop rotations deliberately
- States have already tight nutrient mgmt. regulations
- Much more labor intensive to compost
What are your thoughts on promoting composting as a method of risk reduction?

Comments:
• Must be done at source
• Added cost, but viable option (3)
• Can be safe and sustainable (2)
• Will increase need for outreach and education (2)
• Composting requirements in proposed rule are too cumbersome for growers to comply (3)
• Must address ‘aged’ versus composted (2)
• Lots of documentation that is a burden to growers (3)
• Should be promoted
• May vary depending on climate (dry climates take longer to break down)
• We already provide compost workshops (4)
• Growers would rather buy compost than do it themselves (2)
• If done improperly, gives false sense of security
How can the industry best facilitate the transition from raw manure use to composting practices?

Other:
- EQip funds from NRCS
- Need more data on risk and more info on how to do it affordably
- Don’t regulate it
- Tax credit (such as EnergyStar rebate)
Is there any information you can share about resources you use with your growers who compost to assist in the process?

Comments:
• Univ. of California materials are useful
• NRAES: Field Guide to On-Farm Composting
• Univ. of Maine Composting School (week long)
• Not enough currently available
• Only organic growers do because they have to
• AZ/CA LGMA guidelines
• CPS SCRI grant on testing compost for gen. E.coli is available
• Cornell nutrient management
Do your state regulations differ from the proposed produce safety rule with regards to the soil amendment provisions?

Comments:

- No, growers use 120 NOP guidelines
- Might affect our water protection regulations in the state
- State has biosolid regulations
- State environmental health directors have recommended one year application interval
- Not sure (3)

Yes, 22%

No, 78%
Handling & Storage Survey Questions
How common is it for farms to have their produce packed, stored, or held by another company that is not legally owned by the farm?

- Very common: 26%
- Somewhat common: 29%
- Neutral: 15%
- Somewhat uncommon: 12%
- Very uncommon: 18%
Is this type of packing, storage, or holding more prevalent in certain types of commodities (i.e. apples, leafy greens, nuts)?

Comments for YES:
• Tree fruit (3)
• Kiwi
• Nuts
• Onion (4)
• Potatoes (5)
• Peaches, blueberries by co-ops
• Apples (6)
• Cabbage
• Pome fruit
• All winter veggies grown in Yuma, AZ
Why do farms decide to contract packing, storing or holding to other companies?

Comments:
• No sense for every farm to have a packing/storage area
• Broaden farm offerings
• Industry can better control quality
• Facilities too expensive
• Small farms need to consolidate produce to access different markets

- Facilities are too expensive to own: 15
- More cost effective: 17
- Other: 8
How common is the practice of farms buying, packing, or holding produce grown on another farm?

- Very common: 28%
- Somewhat common: 31%
- Neutral: 16%
- Somewhat uncommon: 16%
- Very uncommon: 9%
Is this practice of farms buying, packing, or holding produce grown on another farm more common with some commodities than others?

Comments for YES:
- Many similar to last question
- Peaches, apples, onions, sweet corn
- CSAs
- Might not be termed ‘farm’, we call them ‘shippers’ here
Is it impacted by farm size (i.e. more common on small farms or big farms)?

- More common on big farms: 3%
- More common on small farms: 27%
- Farm size does not matter: 70%
Why do people buy, pack and/or hold produce grown on another farm?

Comments:
• CSAs (9)
• If you cannot grow profitably, you might buy it (3)
• Broadens offerings (3)
• Did not grow, but is in demand by customer (3)
• Smaller farms will use another farm to fill orders
• Crop failure
• Equipment and marketing limitations
• Value added
• Provides additional revenue by ‘renting’ packhouse space
PSA Update

• Final curriculum review still underway
• Plan to conduct train-the-trainer workshops as soon as we can
• Plan to train (and certify) growers as soon as we can
  – This means before the rule if final
  – Follow up with them if something is different
Traceability

• Discussion for May 5th meeting
• Send your questions to Gretchen to build discussion (glw53@cornell.edu)
  – Where is FDA on their traceability studies?
  – What is FDA going to require for traceability?
  – What information needs to be on labels?
  – Will the information need to be on masters, pallets, individual produce or all?
Other Topics

• Next meeting: Monday May 5th at 2PM EDT
• Discussion on Traceability
• Send Gretchen (glw53@cornell.edu) additional agenda items
Contact Us

Elizabeth A. Bihn, Ph.D.
Produce Safety Alliance Director
eab38@cornell.edu

Gretchen L. Wall, M.S.
Produce Safety Alliance Coordinator
glw53@cornell.edu

www.producesafetyalliance.cornell.edu