

Comment Info: =====

General Comment:References Docket Number AMS?FV?07?0090.

I am not in favor of the proposed change in the federal regulations that could potentially require growers of all fresh leafy green vegetables to follow specified guidelines in the fields and during post-harvest handling.

These guidelines include growing practices that discourage biodiversity and sustainable/organic farming practices, deplete soil fertility, and create "sterile" fields?methods that have not been scientifically proven to actually reduce E. coli 0157 bacteria but are certain to reduce biodiversity, harm wildlife, and burden family-scale farms.

Small- and medium-scale farmers would bear the greatest financial and logistical burden of such specified guidelines. For example, if the rules require testing for pathogens at every harvest?as they currently do in California?then large-scale farms that grow one type of crop and harvest only one to three times per season would pay much less than smaller and more diverse farms that continually harvest many types of vegetables. If regulations dictate a single set of growing practices and food safety measures, which are appropriate for large-scale "factory farms" but not for diverse family farms, we risk losing the very farms that grow leafy greens in a healthy and sustainable way. A one-size-fits-all regulation will not work!

The rules threaten biodiversity and environmental sustainability in several ways. Farmers would be encouraged to eliminate wildlife and any vegetation that may provide habitat for wildlife. The rules also discourage the development of microbial life in the soil. These methods have not been shown to reduce the risk of harmful bacterial contamination. In fact, sustainable farming methods that promote microbial life in soil have shown to reduce E. coli 0157 because it has to compete with other microbes and is therefore less likely to thrive. However, the aim of these rules seems to be for sterile fields that support no forms of life, except for the leafy greens.

Please act responsibly to both people and the environment in your deliberations.

Thank you,  
Bill Pogson