R-CALF USA FOOD SAFETY RECOMMENDATIONS

The United States' food safety problems will persist unless Congress addresses their root causes, which are unique to the United States and are three-fold:

1. Current food policies promote and facilitate the consolidation and contraction of independent farmers and ranchers and this is inherently dangerous to both food safety and food security.

2. Sound U.S food safety standards were weakened when Congress acquiesced to international standards that prohibit it from targeting food safety problems originating in foreign countries with stricter standards – *unless* Congress first applies the stricter standards to the U.S., regardless of whether the stricter standards are applicable to the U.S. food production system.

3. Congress' adoption of the internationally-touted HACCP[1] food safety system hampers Congress' ability to ensure that even existing food safety requirements are properly followed.

Any attempt to remedy our food safety problems by building on these failed components, as was done in the Food Safety Enhancement Act of 2009 (H.R. 2749), would result in complete failure.

RECOMMENDATIONS

1. Correct and reverse the three above-listed fundamental deficiencies in our food system that makes genuine food safety in the U.S. unattainable.
2. Reestablish food safety standards previously weakened when Congress acquiesced to international standards, and then direct agencies responsible for food safety to begin hands-on inspection and enforcement of U.S. food safety standards for all imported food and for food processing facilities where food contamination is known to frequently occur.
3. Do not accord international standards more weight than is accorded any other standards, such as those recommended in studies by U.S. land grant universities.
4. Do not presume that international standards – designed specifically to facilitate trade – are appropriate standards to be imposed on U.S. farmers and ranchers or that corporate food processors can adequately police themselves under HACCP. International standards must *not* be referenced or cited in U.S. food safety statutes, and HACCP must be reformed.
5. Take no action that would impose any additional regulatory burdens on any U.S. farmer or rancher, including any requirement to register their farms and ranches with the federal government or participate in a federally mandated food traceability program.
6. If Congress suspects that a particular segment of U.S. production agriculture is contributing to food safety problems, a formal risk and hazard analysis must be conducted to determine the specific practice(s) that caused or contributed to the food safety problem and the specific type of farming operation involved in that practice (i.e., an independent farming operation or an industrialized food production unit) to determine the specific corrective actions needed.

Individual U.S. farmers and ranchers deserve no less from Congress than to be presumed careful, conscientious, and law abiding food producers – a reputation earned by them while feeding this great nation during the past two centuries.

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[1] HACCP is the acronym for Hazard and Analysis Critical Control Points, which replaced direct government inspection with, essentially, an honor system that relies on food processing facilities to police themselves.