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Food "Safety" Reform and the Covert Continuation of the Enclosure Movement

By Nicole Johnson

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"Healing ourselves is the essence of democratic development."-- Michael Parenti, final remarks, California State University, Channel Islands, March 11, 2004.

Introduction

Our nation is awakening to the fact that convenience-oriented, industrial food products, which have substantially displaced our traditional diet, have altered our collective health for the worse. Citizens are actively seeking out food that is unadulterated by a long list of unhealthy though government-approved -- ingredients in industrially processed products, recognizing them to be a primary cause of our steady decline into preventable chronic disease and premature death. People increasingly demand food in its natural form to nourish their bodies down to the cellular level.

In response, farmers and entrepreneurs around the country are striving to re-create the infrastructure required for healthy local food to flourish. But their hard work and not inconsiderable investment will be snuffed out if the pending food safety bill is passed by the Senate. Those who care about health their personal health, the environment's health and the health of local economies must understand that the fate of healthy local food is on the line.

The Food Safety Enhancement Act (HR 2749) that passed the House in July and its counterpart in the Senate, the Food Safety Modernization Act (S 510), will enable transnational corporations to tighten their grip over the global food system. Under the pretext of food safety, the legislation will facilitate the off-shoring of our food supply, allowing powerful transnational corporations to move commodities and finished products more easily between their international subsidiaries, greasing the way for further concentration of the market. At the same time, the legislation will hyper-regulate less well-capitalized farming and processing operations out of business. Within a short time frame, small- and medium-scale farmers, processors, and distributors will fall victim to its business-busting and job-killing requirements.

Furthermore, this self-styled safety reform will make our food less safe, not more. How could that be? The reason food safety in the U.S. will actually decrease is to be found in the WTO rules, specifically the Sanitary and Phytosanitary Agreement, that requires developed countries to accept less developed countries food safety standards as "equivalent" to their domestic standards. Simply put: The overriding -- though unpublicized -- motivation for passing this legislation is to make the importation of food into developed countries less burdensome for transnational corporations. To achieve that goal, vested interests want to harmonize international standards. So, while our farmers' operations would be held to increasingly higher standards that demand costly testing, tracking, fees, and extensive, burdensome paperwork, transnational corporations will be able to more easily shift production anywhere it's cheaper and less regulated to produce. More of what we used to produce ourselves will be imported.

In addition, the authority of local and state regulatory agencies will be usurped by Food and Drug Administration, so that it can align that is, harmonize -- its regulations with international standards developed by powerful vested interests. Though no one in the corporate-owned media can be bothered to bring it up, unelected and unaccountable supranational bodies will set policies that govern how food is allowed to be grown in the US.

Once implemented, this legislation will ensure that the dominant industrial global food system is anointed as the only legitimate manner of food production and distribution, a deception that amounts to a covert continuation of the Enclosure Movement.[1] Just as the Enclosure acts during the 17th through 19th centuries drove peasants off what was once communal land, the food safety legislation will serve to bar small- and medium-sized business people from engaging in food production. It will essentially seize the most of basic human rights and bestow upon the well capitalized and connected a monopoly on food production.

Of course, there are other ways to improve food safety that do not require sacrificing US jobs and businesses. It would be unconscionable for Congress to grant the FDA police-like powers over how and ultimately who produces our food without first considering alternatives to that which is being pushed by those behind this legislation who have greatly exaggerated the food safety "crisis."

Job, Jobs, Jobs

Few would disagree with the statement that this country is in dire need of jobs. The forces behind globalization have gutted one sector of our economy after another as industry after industry relocates their operations to foreign countries where labor could be had for less money and fewer, if any, benefits. Even white-collar workers, who erroneously believed themselves immune from the off-shoring of jobs, are continuing to feel

the effects of the controlled demolition of our economy. And, with no visible shame, the media sell citizens a "job-less recovery." (while in 2009 Fortune 500 companies tripled their profits to $391 billion).[2] But one sector of the economy promises real job creation: local food. However, if we don't wise up in time, US farmers will find agriculture off-shored, too, "for our own good."

The local food movement is about more than just healthy food. It offers a real way to rebuild, revitalize and stabilize our local and regional economies. Local food provides us an opportunity to heal individuals, their communities and their environment. As John Ikerd, Professor Emeritus of Agricultural Economics at the University of Missouri, Columbia, takes up the issue in a presentation entitled "Reweaving the Fabric of Rural America: Food as a Common Thread." Ikerd says that "If we are to succeed in this effort, we must recognize that we are not creating a new landscape but are mending a landscape that has been ravaged by forces that are quite capable of ravaging again. Thus, we must reweave the torn fabric or rural America with thread strong enough to withstand the inevitable ravages of time." [3]

Ikerd also says that "We need to understand the nature of the forces resisting our efforts to reweave the economic, ecological, and social fabric of rural places. We need to understand that increases in unemployment, poverty, and public dependency in rural areas are all symptoms of the continued extraction of economic wealth or capital from rural areas. Erosion of soil, degradation of landscapes, and pollution of air and water are all symptoms of the continued extraction of natural resources or ecological capital from rural areas."[4]

Faced with this jobless recovery that's perfectly acceptable to big business and government, people need to rely on themselves and each other to self organize in order to create a viable alternative. If you look around, you can see it happening: As John Tozzi writes in *Business Week*, "Entrepreneurs are flocking to local food, starting businesses devoted to producing and delivering food within their communities. Just as consumers focus new attention on what we eat and where it comes from, farmers, foodmakers, restaurants, retailers, distributors, and processors are rethinking the business models behind it. They want to create enterprises that will succeed in the long run for local food to be more than just a fad or a luxury for wealthy Western consumers."[5]

The number of farmers in this country has steadily, and at times dramatically, declined due to policies developed by the Committee for Economic Development. The group of business and financial leaders' plans were most clearly articulated in CED's 1962 report called "An Adaptive Program for Agriculture," which spelled out how to reduce by millions the number of farmers engaged in agriculture so that agriculture could be put in the service of big business.[6] But, for the first time in a over a century, we're seeing an increase in the number of farmers. Tozzi notes that "Between 2002 and 2007, the number of American farms increased by 76,000, according to the latest data from the US Agriculture Department's Census of Agriculture, compared to a decline of 87,000 in the five years before that."[7]

Harvesting Social Justice

These new farmers display a new sensibility: farming with a mission. Tozzi explains that "Local food ventures often have goals that are not strictly financial. Most of the companies examined in the report factored in some nonfinancial business decisions, such as their impact on the environment, workers, and communities. They're also not interested in growth at all costs."[8] On the contrary, the new breed of farmer is looking to create scale-appropriate stability within a thriving community, the opposite of policies advocated by industrial agriculture.

As discussed in a report produced by the Illinois Local and Organic Food and Farm Task Force for the Illinois General Assembly, "The business of creating and maintaining all the links in the local supply chain aggregating, processing, packaging, storing and transporting products translates into jobs that cannot be outsourced. Right now, such a system doesn't exist. There is not enough local food to meet the demand, nor enough farmers growing local food, nor companies in the business of processing local food. But there are too many food marketers disappointing their customers. This void is what's called opportunity."[9]

The local food movement is cultivating a system in which money circulates within a community, benefiting hundreds of people rather than allowing profits to be extracted by a few in the middle who have captured control of the inputs, outputs, distribution and sales of the global food system. The Illinois Task Force report states that "Studies show that money spent at local businesses creates a multiplier effect, internally circulating the same dollars up to eight times within the local economy. Using the conservative economic multiplier of two to three cycles, a 20 percent increase in local production, processing, and purchasing will generate $20 to $30 billion of new economic activity annually within the state's boarders. Thousands of new jobs will be created for farmers and farm-related businesses."[10]

The Illinois Task Force report notes how important is has become for people to know where their food comes from and how it's grown: "Most Illinois citizens are only a few generations removed from the farm. During that time a global food system emerged, and people stopped asking where food comes from. But it is precisely this question that has spurred nutrition-minded moms, public health professionals, rural advocates, educators, restaurant chefs, and many others to jumpstart the local food movement. Nevertheless, transforming this movement into a sustainable economy will require significantly greater scale than can be provided by a relative handful of farmers showing up at the outdoor market with pickup trucks." [11]

Consequences of Pending Legislation to Local Healthy Food

The Carolina Farm Stewardship Association recently issued a report entitled "Hurting NC's Local Food Harvest: The Unintended Consequences of Federal Food Safety Legislation on North Carolina's Small Agricultural Enterprises" that lays out what North Carolinians have to lose if this legislation passes. The report's author, Roland McReynolds, analyzed the effects of S 510, concluding that "Costs to comply for North Carolina small businesses could exceed 100 hours in labor and $9,500 in consulting and testing expenses per year. These and other costs for complying with one-size-fits-all food safety rules could force many small farms and food business to abandon value-added markets. The significant likelihood of unintended consequences from this FDA regulation means that many jobs and farms stand to be lost." [12]

McReynolds points out that "The existing law defines food manufacturing broadly, and captures the activities of tens of thousands of farms and small businesses. Although under certain circumstances food processing on a farm is exempt from the current law, those existing FDA regulations are arbitrary and make it very difficult for a farm to expand its markets or respond to changing economic conditions." [13]

The Carolina Farm Stewardship Association has been lobbying for "common sense" amendments to the bill, because the legislation "takes the unprecedented step of authorizing FDA to enforce rules on how to grow fruits and vegetables at every farm in the nation, no matter how small.

Regulators and lobbyists in Washington, DC assert that it is vital for pubic safety that FDA have this control, but the vast majority of produce-related illness outbreaks are traced to processing facilities, not farms." [14]

McReynolds position that the primary source of pathogen contamination is large-scale processing and distribution and not farms is confirmed by a January 2010 report commissioned by the Alliance for Food and Farming called "Analysis of Produce Related Foodborne Illness Outbreak." The report found that only "21.9 percent of all foodborne illnesses were associated with produce. Of that 15.8 percent were a result of improper handling after leaving the farm and 6.1% of illnesses were associated with the growing, packing or shipping of produce. Food items other than produce caused 87.7% of the outbreaks or 78.1% of the foodborne illnesses from 1990 to 2007."[15] These findings strongly suggest that legislating costly and business-busting requirements on farm operations is misplaced and unwarranted, especially in light of its negative impact on farmers' livelihoods.

The very last thing this job-creating movement needs is to have policies legislated on behalf of vested interested in control of the global food system create unnecessary regulatory obstacles that make entering or staying in business financially ruinous. McReynolds says that "Not only will FDA rules impact how these farmers grow produce, but it will impact their ability to maintain diversified farm income, and impact their ability to manage input costs." [16]

"Unintended" Consequences and Other Fairy Tales

While McReynolds politely characterizes the legislation's consequences as unintended, recent history and a review of the economic literature suggests that it is well understood by those pushing the legislation that it will shut down small- and medium-sized businesses. In fact, an argument can be made that the consequences are acceptable collateral damage and even a desirable outcome from the viewpoint of vested interests.

Key provisions in the legislation require farmers who sell more than 50% of their crops to the wholesale market to register as "facilities" and create safety plans Hazard Analysis and Risk-Based Preventive Controls (HARPC) -- for each crop they grow. HARPC is a variation of HACCP (Hazard Analysis Critical Control Points), an approach to food safety originally developed for industrially processed foods by microbiologists at Pillsbury.[17] HACCP greatly assisted the manufacturers of processed foods by assuring the safety of their products without any need to engage in costly, wasteful and ultimately ineffective product testing. It could achieve this success with HACCP because processed foods undergo a "kill step," such as cooking, drying, refining or acidification that eliminates any pathogens that may be present.

But applying HACCP to raw food processing, where there is no such critical control point or kill step to eliminate pathogens, is an unscientific fraud perpetrated by those with agendas other than food safety. In the early nineties, HACCP was mandated for all raw meat and poultry slaughter and processing plants by the current Food Czar Michael Taylor, a former King & Spaulding lawyer for Monsanto who would go on to become its Vice President of Public Policy. The maneuver, a politically-based policy masquerading as a science-based measure, succeeded in privatizing the meat inspection process for large-scale plants and hyper-regulating small- and medium-sized plants out of business.[18]

The regulations Taylor crafted limited meat inspectors authority to reviewing paperwork compiled by company employees at company-designated critical control points and eliminated inspectors' authority to pull obviously contaminated meat from anywhere on the assembly line.[19] These changes allowed contaminated meat out the door with the USDA seal of approval. If that contaminated meat was later discovered, smaller downstream processors were left accountable for problems caused by the original slaughterhouses.[20]

Twelve years later, the USDA's Food Safety and Inspection Service (FSIS) is calling for more microbial testing at downstream plants, an admission that the FSIS-style HACCP system regularly allows substantial amounts of contaminated meat shipped into commerce.[21] This development has led the Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America (R-CALF) to call for FSIS-style HACCP to be abandoned or revamped.

Expected Collateral Damage

Economists who have analyzed the costs associated with implementing HACCP plans consistently and clearly state that the costs are significant. In "The Economic Implications of Using HACCP as a Food Safety Regulatory Standard," Laurian Unnevehr and Helen Jensen write that "The fixed costs of adding control technologies and for HACCP training may be prohibitively large for small firms. Thus its mandate may pose a greater burden on small firms, and lead to further concentration in the processing industry. Some observers have suggested a need for public education directed towards small firms. Others have suggested that there are operating efficiencies to be gained once HACCP is in place, through better organization of labor or processes (Mazzocco, 1996; Henson, et. Al., 1998) which small firms could capture if they overcome initial adoption costs. However, it is clear that there are economies of scale in human capital needed to implement HACCP, and thus its imposition will favor large firms." [22]

The authors note that mandating HACCP not only leads to greater food industry concentration, but that "HACCP regulations may also create incentives for greater vertical coordination to control food safety throughout the production process." [23]

In an article entitled "HACCP in small companies: benefit or burden?" Eunice Taylor writes that "Practical experience and a review of food safety literature indicates that success in developing, installing, monitoring and verifying a successful HACCP system is dependent on a complex mix of managerial, organizational and technical hurdles. In coping with this set of interrelating factors, even the largest food companies, equipped with significant resources of money, technical expertise and management skills may face a difficult challenge; the small company may feel that the difficulties of HACCP are potentially insurmountable." [24]

Trained personnel are key to successful HACCP plans. Eunice Taylor points out that "In large companies, the training and technical departments often lead the HACCP project: most small companies do not have these resources. It is evident therefore that even if owner-managers can be convinced of the necessity of HACCP, the allocation of sufficient "time' for its development becomes a major constraining factor. This is compounded by the requirement for specific HACCP training and the need to access the necessary technical expertise" To the small business this translates into a heavy financial burden and most owners look to Government or other agencies for external help at minimal costs." [25]

In a 1996 presentation on "Improving Cost/Benefit Analysis for HACCP and Microbial Food Safety: An Economist's Overview," Laurian Unnevehr and Tanya Roberts discuss how HACCP costs are not only substantial but that economies of scale directly benefit larger industry players. The authors explain that the costs of HACCP "include the costs of designing and implementing controls that achieve the standard for pathogen reduction. The array of control options available will vary with type of animal product and by type of changes required to control a specific pathogen. HACCP involves a large fixed investment to develop the plan and to train staff. It may also require new capital equipment. These fixed costs mean that there are economies of scale in HACCP. The variable costs are often minor in terms of labor and materials. Thus costs will vary by scale of plant, with implications for industry structure. A full accounting of costs would recognize process redesign. **However, these generalizations may not hold for HACCP at the farm level, where variable costs could be more important."** [26

The United Nation's Food and Agriculture Organization has also reviewed the economics of HACCP and is quite clear about HACCP's ability to drive small- and medium-sized business into bankruptcy: "HACCP rules mandated across an industry will have different impacts on the industry, depending on the market structure of the industry. In general, HACCP rules will likely impose higher costs on small firms than on large firms. An example of this is provided by estimates of market structure change on the United States meat and poultry slaughter and processing industry predicted to result from HACCP. Industry leaders predict that the regulation will drive small producers out of business. The actual effects on small producers will depend on the cost disadvantage faced by small firms, and the degree to which small plants can raise prices in the event they face a cost disadvantage. It will also depend on the ability of small plants to occupy small market niches that allow them to pass along higher product costs. For the United States meat and poultry industry, economists predict that if small producers do exit the industry, the pattern will be an increase in the rate of exits and decrease in the rate of entries." [27]

Other countries have had some experience with food safety laws being used as a pretext to destroy local food production and traditions. Speaking in India at a 2006 conference called "Beyond the Monoculture," Vandana Shiva tells how food safety laws are forcing people to globalize, a process that displaces their traditional foods. Shiva says that "the pretense of food safety has been another way of dismantling the local food economy."[28] By claiming traditional ways of food production are "dangerous," laws have been passed that deregulate big industry and criminalize the methods of those trying to make an honest living.

Any Food Safety Reform with Teeth Doomed by Trade Agreements

The key to understanding why nothing in this legislation will make our food safer requires understanding the role of trade rules enforced by the World Trade Organization. Though ignored by the media, congressional representatives, senators and "Make Our Food Safe," the coalition of groups pushing the legislation, the inconvenient fact is that WTO rules specify adherence to the "equivalency" system. As explained byLori Wallach and Patrick Woodall of Public Citizen in *Whose Trade Organization: A Comprehensive Guide to the WTO*, "The WTO's terms contribute to these food-safety problems not only by leading to substantially increasing food trade, but by constraining governments' ability to address problems posed by foodborne illnesses. Not only have nations' food safety laws come under threat in the powerful dispute-resolution body of the WTO, but WTO rules embodied in the WTO Sanitary and Phytosanitary Agreement harm public well-being by encouraging an ongoing race to the bottom in food-safety standards." [29]

A 2007 report by Public Citizen also warned of this problem. In a report entitled "Trade Deficit in Food Safety: Proposed NAFTA Expansions Replicate Limits on US Food Safety Policy That Are Contributing to Unsafe Food Imports" the authors explained that "Trade rules contained in NAFTA, the WTO and incorporated into the new FTAs pending before Congress forbid special safety requirements for imports. Even though border inspections of imports may be the only food safety check on imported foods relative to the domestic food safety system which includes several levels of oversight, trade agreements "non-discrimination" or "national treatment" rules require that the United States not inspect imported foods at a greater rate than domestic foods. Further, the trade agreements require the United States to rely on foreign regulatory structures and foreign safety inspectors to ensure that food imports are safe. This includes rules that obligate the United States to find the different -- perhaps less safe -- meat and poultry inspection systems of importing countries to be "equivalent" to the U.S. system, and then allow "free passage" of products from such countries."[30]

The take-away message is clear: the US can't require foreign producers in less developed nations to have a system that is equal to ours; we have to accept their different or lower standards as equivalent to domestic standards. Nevertheless, the legislation will hold domestic producers to higher standards than foreign producers. Once you understand this reality, the argument that thelegislation is needed to improve the safety of imported food reveals itself to be a fraud.

Despite the fact that the World Health Organization identifies globalization of the food supply as a key cause of foodborne illness worldwide, such trade will increase, even displacing US production. We are legally prohibited from doing anything meaningful about it, unless we're willing to sustain vast fines or withdraw from the WTO. As explained by Helena Paul and Richard Steinbrecher in *Hungry Corporations: Transnational Biotech Companies Colonise the Food Chain*, "The World Trade Organization (WTO), created out of the GATT in 1994, is a perfect vehicle for extending corporate rights. Unlike other international instruments, it has legislative and judicial powers that can be enforced against states through its complaints mechanism. Governments can use this procedure to change laws and lower environmental and social standards in the interests of "free trade.' Yet it does nothing to limit the ability of transnationals to use their economic power to drive competitors out of the market by unfair means; absorb competitors through mergers and acquisitions; or form strategic alliances with competitors to share technology, production facilities and markets.'" [31]

It's long past time we understood that the call for "free trade" is a euphemism for supranational control. When barriers to trade are removed, the obstacles being removed are the protections necessary to preserve a nation's economic and social welfare. The removal of these protections have hurt people worldwide while transferring control of national resources and sovereignty itself -- to supranational transnational corporations that run the global food system.

Is Our Food Really That Unsafe?

Now that we understand how trade rules force us to accept as equivalent the safety regimes of less developed nations from which we import so much of our food supply, we should turn to another myth: the food safety "crisis" itself. With all the newspaper headlines endlessly trumpeting new food-borne illness outbreaks and numerous articles profiling the stories of the victims of the most dangerous cases of E. coli O157:H7 food

contamination, people can't be blamed for getting the idea that something is terribly wrong with the safety of our food supply. However, perception isn't always reality. And perception especially one manufactured to gain a population's consent for something to which it wouldn't normally agree can be a very powerful thing.

As Edward Bernays observed in his 1928 work *Propaganda*, a little book that became a sort of bible for the public relations industry, "No serious sociologist any longer believes that the voice of the people expresses any divine or specially wise and lofty idea. The voice of the people expresses the mind of the people, and that mind is made up for it by the group of leaders in whom it believes and by those persons who understand the manipulation of public opinion. It is composed of inherited prejudices and symbols and clichés and verbal formulas supplied to them by their leaders."[32] Bernays, the nephew of Sigmund Freud, understood better than most that nothing aids the manufacture of perception like a good dose of fear.

Using a page from Bernay's playbook, the wealthy trusts and foundations that are *generously* underwriting the public policy campaign waged by Make Our Food Safe, the consortium of groups tirelessly pushing for food "safety" reform, repeatedly employ fear to their advantage. One such effort is the"Produce Safety Project" at Georgetown University, an enterprise funded by the Pew Charitable Trusts, which published in February a report that recalculated the "Health-Related Costs of Foodborne Illness in the United States."[33] The stated purpose of the study "is to provide policymakers with measures of the economic burden of foodborne illnesses both at the aggregate level and at the pathogen level." The report's author, Robert Scharff, received a grant of $47,000 for his work,[34] which recalculates the economic costs associated with foodborne illness. His new estimate dramatically increased previous estimates of $6 billion to $38 billion a year to $152 billion a year -- a piercing headline screamer guaranteed to heighten public pressure on the Senate to hurry up and pass the legislation.

While Scharff's math itself isn't a problem, the figures on which he bases his calculations present numerous problems. The figures, derived from the 1999 Mead Study and adopted by the Centers for Disease Control and Prevention (CDC), have been the subject of much debate. The Mead Study, entitled "Food-Related Illness and Death in the United States,"[35] is the source for the infamous sentence "We estimate that foodborne diseases cause approximately 76 million illnesses, 325,000 hospitalizations, and 5,000 deaths in the United States each year." This sentence has become a mantra of sorts, repeated endlessly by practically everyone demanding that the government do something to make our food safe. Along the way, most people seem to forget the figures are estimates and not necessarily an accurate picture of reality, because they are based on multipliers as large as 40 for every actual case proven to be caused by foodborne pathogen.

Journalist David Gumpert has examined the report and makes a number of perceptive points. He notes that not only is the study ten years old "but the data it draws on goes back as far as 1948."[36] Gumpert also points out that the numbers appear to be "wild estimates of the real situation": "Even allowing for the multiplier effect the likelihood that for every reported illness, there may be between ten and forty times that number not reported the numbers don't obviously add up to the millions projected by the CDC. Consider that in 2007, the CDC reported a total 21,183 cases of foodborne illness, based on reports from states and localities around the country. Multiplying that by 40, you still only get 847,000 illnesses, a far cry from 76 million."[37]

Gumpert also notes that the cases of reported foodborne illness counted by The Center for Science in the Public Interest, a key member of Make Our Food Safe, found "168,000 illnesses over the 17-year period 1990-2006. That averages out to fewer than 10,000 cases per year."[38]

The number of deaths attributed to foodborne illness also is a matter of debate. The Mead Study attributes a whopping 65% of the 5,000 deaths from foodborne illness to *unknown* pathogens. In a paper called "Death due to Unknown Foodborne Agents," Paul Frenzen, a demographer with the US Department of Agriculture reviewed the study's assumptions and finds a number of problems with the estimated deaths, and he urges additional research. Frenzen argues that "No direct evidence indicates that unknown agents transmitted by food are a major cause of premature death in the United States. The lack of evidence is not surprising because most microorganisms resist cultivation on artificial media, and pathogenic agents that are difficult to culture have undoubtedly eluded identification. The innovative study by Mead et al. has increased awareness of the effects of unknown foodborne agents on health. However, their estimate of deaths from unknown foodborne agents depended on accurately estimating deaths from gastroenteritis of unknown cause, a category assumed to include all deaths from unknown foodborne agents. In fact, some unknown foodborne agents do not cause gastroenteritis, and some deaths attributed to gastroenteritis of unknown cause probably involved known causes of gastroenteritis that were either not detected or not reported, including enteric infections, adverse drug reactions, and celiac disease. The estimate of deaths from unknown foodborne agents consequently omitted deaths from unknown foodborne agents that do not cause gastroenteritis and almost certainly overstated the number of deaths from unknown foodborne agents that cause gastroenteritis."[39]

And, of course, gastroenteritis can be due to many other things besides foodborne illness. A bad case of diarrhea can be caused by anxiety, consuming too much alcohol or coffee, medications, antibiotics, sweets, hot peppers, artificial fat (like Procter & Gamble's Olestra, which is noted for its propensity to cause anal leakage). Then there are conditions like celiac disease, Crohn's disease, diabetes, irritable bowl syndrome, lactose intolerance, pancreatis, ulcerative colitis, fructose malabsorption, and pernicious anemia that can direct one to the nearest bathroom pronto.

One last potential cause of diarrhea worth mentioning is monosodium glutamate, widely used in processed, packaged foods and restaurant fare.[40] MSG excites taste and other receptors, so lesser quality foods can appear to the palate to be tastier than they are. The reactive component of MSG is glutamic acid, which the FDA has allowed to be hidden in thousands of processed food products under a long list of names, including hydrolized vegetable protein. Hydrolized vegetable protein got a lot of press recently as the subject of a massive recall, because it may have been contaminated with salmonella. Glutamic acid is an excitotoxin, that can kill brain cells,[41] but the FDA is concerned only about its presence if it may be a vector of foodborne illness. This paradox cuts to the heart of the problem with the FDA and its role of protector of corporate interests over public welfare. If the FDA were truly concerned with food safety, ingredients containing glutamic acid would be banned. How can anyone paying attention not notice that the FDA will go to the end of the world to save us from a possible case of the runs, but approves of our slow poisoning, if the product in question is big money-maker (like GMOs, high fructose corn syrup, aspartame, increasingly high doses of soy protein) for vested interests.

Let's return to the problems with the Mead Study. Compelling information that the Mead Study/CDC numbers are inflated comes from a rather ironic source: a survey conducted last October for Make Our Food Safe by Hart Research Associates/Public Opinion Strategies, which was funded by the Pew Charitable Trusts. The survey interviewed voters rejecting anyone who was not self-identified as a definite voter -- in five states:

Nevada, New Hampshire, North Carolina, Ohio, and Wyoming.[42] These states are notable for being the home states of Senators Judd Gregg (R), Kay Hagan (D), Richard Burr (R), Sherrod Brown (D) and Michael Enzi (R), all members of the Senate's Committee on Health, Education, Labor and Pensions, which was about to vote S 510 out of committee, as well as Harry Reid, the leader of the Senate. The survey findings, complete with newspaper-friendly ready-to-use graphics, were supplied to the press in the Senators' home states to drive home the idea that we need the government to do something to "make our food safe."

Though not highlighted in any of these graphics or publicized by Make Our Food Safe, the state surveys revealed some unexpected results. Participants were asked: "In the past year, have you had a bout of food poisoning or gotten sick from eating what you believed to be contaminated food?" And that question was followed up by this one: "In the past year has anyone in your immediate family other than yourself had a bout of food poisoning or gotten sick from what you believed to be contaminated food?" The answers to these questions should surprise anyone who has been lead to believe that 1 in 4 people get sick each year from something they ate:

	# People Interviewed	Interviewee Ill	Family Member Ill
Nevada[43]	506	13%	14%
New Hampshire[44]	505	6%	9%
North Carolina[45]	501	9%	10%
Ohio[46]	501	9%	10%
Wyoming[47]	402	9%	13%
Total interviewed	2,415		
Average % ill		9.2%	11.2%

So, this yields an annual incident rate of foodborne illness of less than 10% versus the over 25% estimated by the Mead Study. One in ten is certainly a lot smaller ratio than one in four. And that translates to approximately 30 million people a year nationwide getting sick from something they ate, not 76 million cases. Perhaps MOFS thought it would not be helpful to publicize these rather significant findings in its media blitz, since it's hard to argue that the FDA needs expanded police-like powers to oversee how farmers grow and harvest their crops if the country's food safety system isn't really broken.

Perception Versus Reality

If we lived in a world where our perceptions weren't so well managed, we might also see articles in the press about a very important paper Robert Scharff co-authored just a few weeks before the Pew-funded Produce Safety Project report made headlines across the country. In fact, this paper should be required reading for Senators considering their vote for the game-changing legislation. Published in February 2010 and entitled "Food Safety in the 21st Century," the paper looks at the question of whether our food is really getting less safe. It asserts that "Recent increases in reported outbreaks of food-related illnesses have spurred Congress to respond to the public's growing concern over food safety with new legislation purported to strengthen the food safety system. Congress's action reflect the common perception that food is becoming less safe, but **in reality the recent increases in reported outbreaks stem from increased improvements in surveillance of the food supply system and increased press coverage of food-related illnesses**."[48]

Scharff and his co-authors, Richard Williams and David Bieler, state that "Even though it is not the crisis the media makes it out to be, food safety remains a significant problem. A key question for the policy makers is whether legislation that leads to more regulations and inspections will result in significant improvements in food safety. **We believe it will not.**"[49]

As an example of ineffective regulations, the authors cite the FDA's imposition of HACCP safety controls and inspections on raw seafood in the 1990s, explaining that "This case also demonstrates the weakness of a politically motivated regulatory system, as evidenced by the motive of large seafood manufacturers who sought the rule, in part, to impose costs on their smaller rivals. Overall it had a negligible impact on public health." [50]

Scharff, Williams and Bieler also take issue with the world view that the only way to solve problems is to have more regulations and more auditing: "Instead of focusing on regulation and inspection, food safety agencies should invest more resources in discovering solutions to systemic food safety problems"When effective solutions are found, instead of enshrining them in regulations, the government can publish them on the Web. Firms can then determine for themselves whether the solutions will work for their particular product or process and will incorporate these practices into the millions of existing detailed contracts between buyers, suppliers, and insurance companies." [51]

The authors suggest that the expansion of FoodNet and PulseNet are the kinds of investments that "are likely to be much more cost effective than more government inspections of plants since the overwhelming majority of plants do not produce outbreaks."[52]

Their conclusion calls into question the entire premise of the legislation before the Senate. Scharff, Williams and Bieler argue that "By investing in information rather than regulation, the government will increase accountability, foster solutions, and improve the safety of the food supply."[53] Shouldn't we examine alternative approaches to food safety other than the one pushed by those with long-standing ties to industry? Shouldn't Congress be called upon to debate alternatives before it votes in business-busting and job-killing measures? Investigating root causes is the only real way of finding real solutions. Mandating game-changing regulations and auditing that have the power to significantly alter the marketplace have to date provided no evidence of progress, so perhaps we should consider another option before we put our farmers out of business

unnecessarily.

Local Oversight for Local Food

Secretary of Agriculture Tom Vilsak identified one of the ways to revitalize rural America would be to "link local farm production to local consumption. Investments in local processing and storage facilities will allow for large scale consumers (e.g. schools, hospitals and small colleges) in rural communities to buy locally produced goods from smaller scale operations. These new and niche markets will leverage the wealth generated from the land, create jobs and repopulate rural communities." [54] But how realistic how realistic is such a plan if the farmers are run out of business by being subject to the same regulations as the global food system players? It simply will not be feasible to establish a local food procurement process for state institutions if the costs of "safety" compliance pose a barrier for small business or if traditional means of food production are criminalized.

The Illinois Local and Organic Food and Farm Task Force report states that the local food movement needs local oversight, not the sort the pending food safety legislation seeks, which would harmonize domestic standards with international standards. The Illinois Task Force recognizes that regulatory barriers will impede growth and wants to "Allow farms stands to be set up by reducing paperwork, health regulations, taxes and other barriers."[55] It suggests we need to reduce the barriers for those trying to start businesses, noting that "A multiplicity of local, state, and federal regulations hinder farmers' ability to build and expand their various projects. The tangle of jurisdictions, fees, property taxes, and interpretations discourage aspiring entrepreneurs from entering business."[56] The Task Force encourages states to "develop a two-tiered system of rules and regulations to ensure that revised state regulations do not default to existing federal regulations written primarily for industrial-scale farming operations,"[57]

Congress needs to reconsider how food safety rules can be made as democratically as possible for as little cost as possible to small business. Richard Williams, who now serves as the managing director of the Regulatory Studies Program and the Government Accountability Project at the Mercatus Center at George Mason University after a 27-year career as the director of social sciences at the Center for Food Safety and Applied Nutrition at the FDA, recently addressed this issue in a working paper called "Regulation Checklist: Common Pitfalls in Regulations." Williams says we need to watch out for regulation "designed to help some at the expense of others. The regulation may end up helping society overall but the motivation for the regulation, if it can be discerned, should make you suspicious. Firms and industries have used regulation since the beginning to raise rival's costs. The two groups of firms that are normally adversely affected are those that are either not using a particular technology when a technology is mandated by the government or small firms who must bear large, fixed costs over a smaller sales base. This problem is compounded when there is a "bootlegger and Baptist" problem where advocacy groups and a sector of industry agree on the need for regulation to suit their own purposes."[58]

Williams also addresses the issue of federalism as it relates to regulation, and his position differs considerably from that of Deputy Commissioner of Foods Michael Taylor, who advocates the integration of local and state functions with federal standards[59]. Taylor intends to centralize control over a national food safety system, establishing standards that will eventually be adopted by state and local agencies, a goal that will be facilitated by a transfer of federal funds to cash-strapped local and state agencies. The larger, unspoken aim is to align, or harmonize, US laws with international standards. Williams's perspective, however, is one that respects the US constitution. He states that "The agency has not seriously considered issues of federalism, a basic division of governmental responsibilities established by the Constitution. In addition to the constitutional question, states or localities with more local knowledge and more targeted regulations may be the appropriate place to address problems. **In this case there is no need for federal regulation**."[60]

A Fork in the Road

If the pending food safety legislation were designed to prevent the spread of food borne enteric pathogens like E coli O157:H7 the most lethal and high-risk pathogen -- then it would naturally look to the source of the problem: confined area feeding operations (CAFOs), where the interests of global grain traders and global meatpacking meet. E. coli O157:H7 is a variant of the non-deadly and omnipresent E. coli, a gut bacteria essential in the uptake of nutrients.[61] E. coli O157:H7 turns deadly to humans because it is acid resistant, meaning it isn't killed by the acid in our stomachs should we consume it.

As discussed in a report by Charles Benbrook entitled "Review of the Published Research on the Sources and Spread of E. coli O157:H7," cattle fed a high grain ration have levels of E. coli O157:H7 100-times higher than cattle allowed a roughage-based diet. The reason for this dramatic increase is that a grain diet alters the pH level of their digestive system, making it more acidic. This environment favors acid-resistant E. coli. E. coli O157:H7 is spread through manure, which finds it way to crop fields through raw, un-composted manure or though run-off of lagoon water into waterways.[62]

But the proposed legislation focuses its regulations on produce growers, who are the victims of the CAFO-generated pathogens that have polluted the environment. If enteric pathogens are to be reduced, you simply have to address CAFO pollution. Making produce farmers responsible for its appearance on farms is as backwards a solution as making downstream meat processors responsible for USDA-approved contaminated meat coming out slaughterhouse plants. Preventing E. coli O157:H7's spread requires changes in animal husbandry. Does the absence of this requirement indicate the presence of another agenda?

The practices of industrial livestock enterprises are entirely ignored by the pending food safety legislation. And, many in the local food movement find that the source of enteric pathogen pollution are also being ignored by the National Sustainable Agriculture Coalition (NSAC), a group that represents the interests of those involved in sustainable and local agriculture, in its analysis of the legislation. NSAC has been involved in trying to soften the blow of the legislation, but it has only really tinkered with various details, while leaving fundamental problems alone. The group's representatives just don't seem to be fighting hard enough to protect the interests of its membership. All this leads me to ask: Has NSAC become a controlled opposition group? Does it appear to advocate for the interests of its grassroots membership while actually advancing the agenda of vested interests?

If you examine NSAC's membership list, you'll find that among its participating members is the Wallace Center at Winrock International.[63] Winrock International was founded by Winthrop Rockefeller and counts in the long list of its funding partners numerous foundations, government

agencies, international agencies, private sector groups and more, all of whom are aligned with vested interests that want international standards harmonized in order to eliminate barriers to international trade. Winrock International receives financial support from the Bill and Melinda Gates Foundation, the Rockefeller Brothers Fund, the Rockefeller Foundation, the DOE, USAID, the US Department of State, the USDA, the World Bank, the FAO, SYSCO and the Tides Foundation.[64] Winrock International also has long-standing ties with Monsanto, which has benefited from Winrock's help in introducing its products to farmers in developing nations around the world. It's hard to image that any organization advocating for the grassroots could be in partnership with a group funded by the likes of these powerful vested interests and not be subject to their influence or control.

The proposed food safety legislation is an extremely powerful tool designed to enable the dominant industrial global food system to control entirely how food is grown, harvested, processed, distributed and retailed. Like the Enclosure Movement, food safety reform will cause many to be displaced from their livelihoods and land. Are we going to accept these revolutionary measures, just because we're told, "it's for our own good"?

The Senate must reject out of hand this unnecessary, dangerously flawed and game-changing bill. It fails to accomplish is stated purpose and will result in unacceptable consequences.

References:

[1] "The Enclosure Movement in England and Wales,," an excerpt from *The Enclosure Maps of Enlgland and Wales, 1595-1918* by Roger J.P. Kain, John Chapman and Richard R. Oliver.http://assets.cambridge.org/97805218/27713/excerpt/9780521827713_excerpt.pdf

[2] "Jobless Recovery Explained in Two Simple Statistics" by Annie Lowrey. The Washington Independent. 4/15/10. http://washingtonindependent.com/82327/jobless-recovery-explained-in-two-simple-statistics

[3] John Ikerd, "Reweaving the Fabric of Rural America: Food as a Common Thread," a presentation made at PASA's 15th Annual Farming for the Future Conference, Weaving a Diverse Landscape: Food as a Common Thread, State College, PA, February 2-4, 2006. http://thegreenhorns.wordpress.com/essays/essayreweaving-the-fabric-of-rural-america/

[4] John Ikerd, "Reweaving the Fabric of Rural America: Food as a Common Thread," a presentation made at PASA's 15th Annual Farming for the Future Conference, Weaving a Diverse Landscape: Food as a Common Thread, State College, PA, February 2-4, 2006. http://thegreenhorns.wordpress.com/essays/essayreweaving-the-fabric-of-rural-america/

[5] John Tozzi, " Entrepreneurs Keep the Local Food Movement Hot," Business Week, December 18, 2009. http://www.businessweek.com/smallbiz/content/dec2009/sb20091217_914398.htm

[6] "An Adaptive Program for Agriculture: A Statement on National Policy by the Research and Policy Committee of the Committee for Economic Development. The Committee for Economic Development. July 1962. http://www.normeconomics.org/adaptive.html

See also: Nicole Johnson, "History, HACCP and the Food Safety Con Job," September 10, 2009. http://www.opednews.com/articles/History-HACCP-and-the-Foo-by-Nicole-Johnson-090906-229.html

[7] John Tozzi, " Entrepreneurs Keep the Local Food Movement Hot," Business Week, December 18, 2009. http://www.businessweek.com/smallbiz/content/dec2009/sb20091217_914398.htm

[8] John Tozzi, " Entrepreneurs Keep the Local Food Movement Hot," Business Week, December 18, 2009. http://www.businessweek.com/smallbiz/content/dec2009/sb20091217_914398.htm

[9] "Illinois Local and Organic Food and Farm Task Force Report to the General Assembly" May 24, 2009, page 9 http://www.foodfarmsjobs.org/

[10] "Illinois Local and Organic Food and Farm Task Force Report to the General Assembly" May 24, 2009, page 12 http://www.foodfarmsjobs.org/

[11] "Illinois Local and Organic Food and Farm Task Force Report to the General Assemby" May 24, 2009, page 12 http://www.foodfarmsjobs.org/

[12] Roland McReynolds, "Hurting NC's Local Food Harvest: The Unintended Consequences of Federal Food Safety Legislation on North Carolina's Small Agricultural Enterprises" page 3 http://www.carolinafarmstewards.org/docs/Hurting%20NC's%20Local%20Food%20Harvest.v3.pdf

[13] Roland McReynolds, "Hurting NC's Local Food Harvest: The Unintended Consequences of Federal Food Safety Legislation on North Carolina's Small Agricultural Enterprises" page 7 http://www.carolinafarmstewards.org/docs/Hurting%20NC's%20Local%20Food%20Harvest.v3.pdf

[14]] Roland McReynolds, "Hurting NC's Local Food Harvest: The Unintended Consequences of Federal Food Safety Legislation on North Carolina's Small Agricultural Enterprises" page 7 http://www.carolinafarmstewards.org/docs/Hurting%20NC's%20Local%20Food%20Harvest.v3.pdf

[15] "Analysis of Produce Related Foodborne Illness Outbreaks" Commissioned by the Alliance for Food and Farming, January 2010. http://www.perishablepundit.com/PunditImages/foodborne-illness-outbreaks.pdf

[16] Roland McReynolds, "Hurting NC's Local Food Harvest: The Unintended Consequences of Federal Food Safety Legislation on North Carolina's Small Agricultural Enterprises" page 8 http://www.carolinafarmstewards.org/docs/Hurting%20NC's%20Local%20Food%20Harvest.v3.pdf

[17] Jennifer Ross-Nazzal, "From Farm to Fork": How Space Food Standards Impacted the Food Industry and Changed Food Safety Standards," Chapter 12 of *Societal Impacts of Space*, Steven J. Dick and Roger D. Launius, Editors, National Aeronautics and Space Administration, Office of External Relations, History Division, Washington D.C., 2007, pp. 219-236.

[18] Nicole Johnson, "History, HACCP and the Food Safety Con Job," September 10, 2009. http://www.opednews.com/articles/History-HACCP-and-the-Foo-by-Nicole-Johnson-090906-229.html

[19] "The Jungle 2000: Is America's Meat Fit To Eat?" by Felicia Nestor, Government Accountability Project, and Wenonah Hauter, Public Citizen. A Survey of the United States Department of Agriculture's Meat Inspectors. September 2000. http://foodandwaterwatch.org/food/pubs/reports/jungle

[20] "Shielding the Giant: USDA's "Don't Look, Don't Know' Policy for Beef Inspection," an investigative report by Tom Levine, Legal Director for the Government Accountability Project. http://www.whistleblower.org/storage/documents/Shielding_the_Giant_Final_PDF.pdf

[21] Dan Flynn, "R-CALF Says Small Plants Need a Break," Food Safety News, April 21, 2010. http://www.foodsafetynews.com/2010/04/r-calf-says-small-plants-need-a-break/

[22] "The Economic Implications of Using HACCP as a Food Safety Regulatory Standard" by Laurian J. Unnevehr and Helen H. Jensen, page 13 http://www.card.iastate.edu/publications/DBS/PDFFiles/99wp228.pdf

[23] "The Economic Implications of Using HACCP as a Food Safety Regulatory Standard" by Laurian J. Unnevehr and Helen H. Jensen, page 13 http://www.card.iastate.edu/publications/DBS/PDFFiles/99wp228.pdf

[24] Eunice Taylor, "HACCP in small companies: benefit or burden?"

Lancashire Postgraduate School of Medicine & Health, University of Central Lancashire, Preston, UK, page 2 http://www.nutricion.org/publicaciones/pdf/taylor.pdf

[25] Eunice Taylor, "HACCP in small companies: benefit or burden?"Lancashire Postgraduate School of Medicine & Health, University of Central Lancashire, Preston, UK, pages 6-7 http://www.nutricion.org/publicaciones/pdf/taylor.pdf

[26] Julie A Caswell and Ronald W. Cotterill. Proceedings of NE-165 Conference, June 20-21, 1996, Washington, D.C., Part Five: Avenues for Improving the Quality of Benefit/Cost Analysis of Food Regulations. 18. Improving Cost/Benefit Analysis for HACCP and Microbial Food Safety: An Economist's Overview by Laurian Unnevehr and Tanya Roberts. 1997 Food Marketing Policy Center, Department of Agricultural and Resource Economics and Department of Resource Economics, University of Massachusetts, Amherst. Page 226 http://ageconsearch.umn.edu/bitstream/25947/1/n1659618.pdf

[27] "Seafood Safety - The Economics of Hazard Analysis and Critical Control Point" FAO Corporate Document Repository.http://www.fao.org/DOCREP/003/X0465E/X0465E08.htm

[28] Vandana Shiva speaking at "Beyond the Monoculture," a conference at Ladakh, India, 2006

http://hartkeisonline.com/2010/02/15/vandana-shiva-on-food-safety-laws/?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+HartkeIsOnline+%28Hartke+Is+Online!%29&utm_content=Yahoo!+Mail

[29] Lori Wallach and Patrick Woodall, *Whose Trade Organization: A Comprehensive Guide to the WTO*, Public Citizen, The New Press, 2004, page 54

[30] "Trade Deficit in Food Safety: Proposed NAFTA Expansions Replicate Limits on US Food Safety Policy That Are Contributing to Unsafe Food Imports," Public Citizen, July 2007, pages 7-8 http://www.citizen.org/documents/FoodSafetyReportFINAL.pdf

[31] Helena Paul and Richard Steinbrecher with Devlin Kuyek and Lucy Michaels, *Hungry Corporations: Transnational Biotech Companies Colonise the Food Chain,* Chapter 2: Corporations: From Royal Charters to Biotech Gold Rush. Page 2. Published in association with Econexus and Pesticide Action Network, Asia-Pacific, Zed Books, November 2003. http://www.econexus.info/Hungry_Corporations.html

[32] Edward Bernays*, Propaganda*. Originally in 1928, republished by Ig Publishing, 2005, page 109.

[33] Robert Scharff, Health-Related Costs of Foodborne Illness in the United States, Produce Safety Project, an Initiative of the Pew Charitable Trusts at Georgetown Universityhttp://www.producesafetyproject.org/media?id=0009

[34] Robert L. Scharff's, CV: http://ehe.osu.edu/facstaff/vitae/rscharff.pdf

[35] "Food-Related Illness and Death in the United States" by Paul S. Mead, Laurence Slutsker, Vance Dietz, Linda F. McCaig, Joseph S. Bresee, Craig Shapiro, Patricia M. Griffin, and Robert V. Tauxe, Centers for Disease Control and Prevention, Atlanta, Georgia, USA http://www.cdc.gov/ncidod/EID/vol5no5/mead.htm

[36] David Gumpert, "What's Really Behind the Hysteria Over Food Safety? It's Definitely Not Scary Data," November 20, 2009. http://chelseagreen.com/blogs/davidgumpert/2009/11/20/whats-really-behind-the-hysteria-over-food-safety-its-definitely-not-scary-data/

[37] David Gumpert, "What's Really Behind the Hysteria Over Food Safety? It's Definitely Not Scary Data," November 20, 2009. http://chelseagreen.com/blogs/davidgumpert/2009/11/20/whats-really-behind-the-hysteria-over-food-safety-its-definitely-not-scary-data/

[38] David Gumpert, "What's Really Behind the Hysteria Over Food Safety? It's Definitely Not Scary Data," November 20, 2009.

http://chelseagreen.com/blogs/davidgumpert/2009/11/20/whats-really-behind-the-hysteria-over-food-safety-its-definitely-not-scary-data/

[39] Paul D. Frenzen, "Deaths Due to Unknown Foodborne Agents," US Department of Agriculture, Washington DC, Emerging Infectious Diseases Journal, September 2004. http://www.cdc.gov/ncidod/eid/vol10no9/pdfs/03-0403.pdf

[40] Andrienne Samuels, "The Toxicity/Safety of Processed Free Glutamic Acid (MSG): A Study in Suppression of Information," Accountability in Research (1999), Vol 6, pp. 259-310. http://www.truthinlabeling.org/l-manuscript.htm

[41] Russell Blaylock, M.D., *Excitotoxins: The Taste That Kills*, 1994.

[42] "Majority of Voters Support New Government Oversight of Food, Pew Commissioned Poll Finds," November 12, 2009 http://www.makeourfoodsafe.org/news?id=0012

[43] Pew Food Safety Nevada Survey: http://www.makeourfoodsafe.org/tools/assets/files/NVPollData.pdf

[44] Pew Food Safety New Hampshire Survey: http://www.makeourfoodsafe.org/tools/assets/files/NHPollData.pdf

[45] Pew Food Safety North Carolina Survey: http://www.makeourfoodsafe.org/tools/assets/files/NCPollData.pdf

[46] Pew Food Safety Ohio Survey: http://www.makeourfoodsafe.org/tools/assets/files/OhioPollData.pdf

[47] Pew Food Safety Wyoming Survey: http://www.makeourfoodsafe.org/tools/assets/files/WYpoll.pdf

[48] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 1 http://mercatus.org/publication/food-safety-21st-century

[49] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 2 http://mercatus.org/publication/food-safety-21st-century

[50] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 2 http://mercatus.org/publication/food-safety-21st-century

[51] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 3 http://mercatus.org/publication/food-safety-21st-century

[52] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 3 http://mercatus.org/publication/food-safety-21st-century

[53] Richard Williams, Robert L. Scharff, and David Bieler, "Food Safety in the 21st Century," Mercatus Center, George Mason University, February 24, 2010, page 4 http://mercatus.org/publication/food-safety-21st-century

[54] Tom Vilsak, "Rural America is in need of renewal" Des Moines Register, January 31, 2010 http://www.truthabouttrade.org/news/latest-news/15531-vilsack-rural-america-is-in-need-of-renewal-

[55] "Illinois Local and Organic Food and Farm Task Force Report to the General Assembly" May 24, 2009, page 28 http://www.foodfarmsjobs.org/

[56] "Illinois Local and Organic Food and Farm Task Force Report to the General Assembly" May 24, 2009, page 32 http://www.foodfarmsjobs.org/

[57] "Illinois Local and Organic Food and Farm Task Force Report to the General Assembly" May 24, 2009, page 34 http://www.foodfarmsjobs.org/

[58] Richard Williams, "Regulation Checklist: Common Pitfalls in Regulations," Mercatus Center, George Mason University, January 2010, page 11 http://mercatus.org/publication/regulation-checklist-common-pitfalls-in-regulations

[59] Michael R. Taylor and Stephanie D. David, "Stronger Partnerships for Safer Food: An Agenda for Strengthening State and Local Roles in the Nation's Food Safety System," a project of Department of Health Policy, School of Public Health and Health Services, The George Washington University in collaboration with Association of Food and Drug Officials, Association of State and Territorial Health Officials, and National Association of County and City Health Officials. http://www.rwjf.org/files/research/20090417foodsafetyfinalreport.pdf

[60] Richard Williams, "Regulation Checklist: Common Pitfalls in Regulations," Mercatus Center, George Mason University, January 2010, page 14 http://mercatus.org/publication/regulation-checklist-common-pitfalls-in-regulations

[61] "Foodborne Pathogenic Microorganisms and Natural Toxins Handbook
Escherichia coli O157:H7," FDA

http://www.fda.gov/food/foodsafety/foodborneillness/foodborneillnessfoodbornepathogensnaturaltoxins/badbugbook/ucm071284.htm

[62] Charles Benbrook, "Review of the Published Research on the Sources and Spread of E. coli 0157" The Organic Center, September 2006

http://www.organiccenter.org/science.safety.php?action=view&report_id=61

[63] National Sustainable Agriculture Coalition, members http://sustainableagriculture.net/about-us/members/

[64] Winrock International, funding partners http://www.winrock.org/partners_current.asp

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