

Chairperson, Board of Agriculture

SCOTT E. ENRIGHT

SCOTT E. ENRIGHT
Deputy to the Chairperson

RUSSELL S. KOKUBUN

State of Hawaii
DEPARTMENT OF AGRICULTURE
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### TESTIMONY OF RUSSELL S. KOKUBUN CHAIRPERSON, BOARD OF AGRICULTURE

BEFORE THE HOUISE COMMITTEE ON AGRICULTURE Friday, February 10, 2012 Room 312 10:30 A.M.

HOUSE BILL NO. 1947, HOUSE DRAFT 1 (Proposed)
RELATING TO AGRICULTURE

Thank you for this opportunity to provide testimony on House Bill No. 1947, proposed House Draft 1 that seeks to establish a new Agricultural Safety and Security program within the Department of Agriculture that will be available to farmers on a voluntary fee-for-service basis. Farmers who choose to participate will be subject to an audit that if successfully achieved will result in a certification from the Department that they are following "generally accepted agricultural and management practices" or GAAMP, and maintaining food security and traceability. GAAMP is defined as the practices adopted by the Department that are to be based on information available to the Department and recommendations from the University of Hawaii College of Tropical Agriculture and Human Resources and other input the Department solicits from governmental and private organizations and maintaining food security and traceability.

The Department appreciates the intent of the measure but has some concerns. There are no standards and definitions established for agricultural safety and security. The bill requires the department to determine the definitions for GAAMP without taking into consideration the on-going food safety efforts which are being addressed by the U.S. Food and Drug Administration (FDA), the U.S. Department of Agriculture (USDA), the State Department of Health and the State Department of Agriculture. The FDA



Testimony of Russell Kokubun HB 1947 HD 1 Page 3

The Department appreciates the effort put into this measure but prefers to address food security and safety issues in a more comprehensive manner that would include the Department of Health in the conversation recognizing their integral role in the development of these standards. Furthermore, we believe there are other legislative vehicles that will accomplish the purpose and intent of this measure.

Thank you for the opportunity to present testimony.



2343 Rose Street • Honolulu, Hawaii 96819 Phone: (808) 848-2074 • Neighbor-Islands: (800) 482-1272 Fax: (808) 848-1921 • Email: <u>info@hfbf.org</u> www.hfbf.org

February 10, 2012

### HEARING BEFORE THE HOUSE AGRICULTURE COMMITTEE

### TESTIMONY ON HB 1947 PROPOSED HD1 RELATING TO AGRICULTURE

Room 312 10:30 AM

Chair Tsuji, Vice Chair Hashem, and Members of the Committee:

I am Dean Okimoto, President for the Hawaii Farm Bureau Federation (HFBF). Organized since 1948, the HFBF is comprised of 1,800 farm family members statewide, and serves as Hawaii's voice of agriculture to protect, advocate and advance the social, economic and educational interest of our diverse agricultural community.

HFBF is in strong support of HB 1947, creating the Agricultural Safety and Security Program within the Hawaii Department of Agriculture (HDOA).

If Hawaii is serious about increased self-sufficiency and sustainability, policies must be adopted by the State to support our farmers and ranchers. This is the intent of this measure -- a common standard that is transparent to all of what is the acceptable standard in Hawaii. Upon adoption, farmers and ranchers may voluntarily request certification by HDOA that they are following these standards. When questioned, this certification can be used to demonstrate that farmers and ranchers are following sound practices. It will provide a practical means for the State to support agriculture.

GAAMPs or "Generally Accepted Agricultural Management Practices" are practices found to be sound, protecting the environment, caring for livestock, protective of workers while providing quality agricultural products. The practices are traditionally developed by state university colleges of agriculture in cooperation with the United States department of agriculture natural resources conservation service and the consolidated farm service agency, and other professional and industry organizations.

The practices are then adopted by the State Department of Agriculture in recognition of what is considered to be sound practices in State policy.

The proposed rules for the Food Safety Modernization Act (FSMA) will be released soon. The Food and Drug Administration (FDA) has completed them and it is currently sitting in Office of Management and Budget (OMB) for final review. As these proposed rules emerge there will be an opportunity for farmers and the State to comment. There will be areas under the jurisdiction of the Hawaii Department of Health (DOH) and similarly, there will be areas that are best addressed by HDOA since they refer to growing and harvesting practices. The law specifically requires consultation with State Departments of Agriculture in this area. The law also provides a mechanism for variances based on specific growing conditions. The rule will provide the framework for the variance process. For Hawaii this is critical. What other state in the country has growing conditions like ours?

We must be ready when the proposed rules are released. This is why we are supporting this measure. Only states can apply for variances. HDOA must be ready to speak on our behalf to make sure that the processes will be workable for us.

Does this bill make it mandatory? No. As the department identifies the guidance which is a compilation of existing laws and rules and information about what are considered good science and risk based practices, farmers and ranchers can voluntarily request that they be certified that they are following these practices. It is like the "good housekeeping seal of approval". Every product is not required to have the seal. Similarly the lack of the seal does not imply that it is less safe. It is a marketing tool and a risk management tool to show people that the product has undergone the specified level of testing. Farmers and ranchers are not required to undergo the certification. But, if their insurance agent or buyer requests it this process provides the mechanism to provide this certification.

How will it work? Why must we pay? We see the process as voluntary. There is an existing model that can be used and this is for nursery exports. Those who want to export undergo certification by HDOA and pay for the services. Those who choose not to, do not.

In summary, why are we doing this? We want to clear the road for farmers and ranchers so they can focus on farming instead of crawling through pages of regulations. This provides a one stop shop for people to come and see what criteria are important to be good farmers and ranchers. It does not tell them how to do it. It guides them into things that must be considered and what the end goal must be.

HFBF strongly requests your support of this measure. It may not be perfect but we request you understand the intent and pass it to encourage further discussion as a means to increase our self-sufficiency and sustainability.

Thank you for this opportunity to address this important issue. If there are questions, please contact Brian Miyamoto, Chief Operating Officer and Government Affairs Liaison at (808) 848-2074.

### Kauai County Farm Bureau

### LATE TESTIMONY

Affiliated with Hawaii Farm Bureau Federation
P.O. Box 3895 • Lihue HI 96766
808-337-9944 (phone/fax) 808-652-3217 (cell)
kcfb@hawaiiantel.net



### The Voice of Kauai's Agriculture

February 10, 2012

ATTN:

Chair Tsuji, Vice Chair Hashem and Members of the House Agriculture

Committee

RE:

Testimony on HB 1947 HD 1 - In SUPPORT, Room 312, 8:00am

Kauai County Farm Bureau requests your support of this measure with requested amendments. Kauai County Farm Bureau supports creating a process for adoption and verification of GAAMPS by the Department of Agriculture.

It is a stated goal of our government to work together to provide for a sustainable and prosperous future for our state and its diverse communities, with greater food security. A critical component is to ensure the viability of agriculture in Hawaii today and to be working on long term solutions to ensure agriculture remains an important sector in our economy and create conditions for it to flourish.

Historically, farmers and ranchers have been celebrated. They were respected and recognized as an important part of a successful society providing food and fiber so others could choose lifestyles that did not involve working in the fields every day.

Today, farmers and ranchers find themselves defending their right to grow crops and raise livestock. The marketplace has begun to dictate how they farm in the name of safety. Farmers and ranchers want to deliver safe and affordable food and other agricultural products. But they cannot do so with their hands tied. Practical tools and streamlined processes are needed that also work for differing practices among farmers.

GAAMPS or "Generally Accepted Agricultural Management Practices" are practices found to be sound, protecting the environment, caring for livestock, protective of workers while providing quality agricultural products. The practices are traditionally developed by state university college of agriculture and natural resources extension and the agricultural experiment station in cooperation with the United States department of agriculture natural resources conservation service and the consolidated farm service agency, and other professional and industry organizations. The practices are then adopted by the State Department of Agriculture in recognition of what is considered to be sound practices in State policy.

We believe the Department of Agriculture is familiar with what farming requires and what happens on farms and would be the most appropriate partner to work with on food safety and other challenge issues that face agriculture.

If Hawaii is serious about increased self sufficiency and sustainability, policies must be adopted by the State to support our farmers and ranchers. This is the intent of this measure -- a common standard transparent to everyone of what is the acceptable standard in Hawaii, and a voluntary certification process through Department of Agriculture.



### **Big Island Farm Bureau**

Phone: 808-885-8015 E-mail: bifb@hawaiiantel.net P.O.Box 1630 Kamuela, HI. 96743

## TESTIMONY on HB 1947 RELATING TO AGRICULTURE

Hearing: Friday February 10, 2012 @ 10:30 AM Conference Room 312

Rep. Tsuji Chair, Committee on Agriculture

Aloha Chair Tsuji and Committee Members

We **STRONGLY SUPPORT HB 2832** Relating to Drought Mitigation; these efforts are crucial Statewide in lieu of our continued drought issues.

My name is Lorie Farrell; I am the Executive Director for the Big Island Farm Bureau (BIFB); We are the largest general agriculture organization on Hawaii Island; striving to be the Voice of Agriculture and represent over 600 agricultural members & producers on the Island of Hawaii. The Big Island Farm Bureau is directly related to the Hawaii Farm Bureau Federation and affiliated with the American Farm Bureau Federation.

BIFB **Strongly Supports HB 1947** and believe it will help support agriculture in the State of Hawaii. Food safety and security is of the utmost importance to agriculture. Farmers and ranchers want to deliver safe and affordable food and other agricultural products. We remain open to improving what we do and how we do it, when the input comes from professionals familiar with our farms and ranches. If and when good management practices are questioned by outsiders, this GAAMP certification can be used to demonstrate that farmers and ranchers are following sound practices.

When food safety concerns or food borne illness occurs it does not matter to public how large or small the farm was or by what means the crop was grown. Generally accepted agricultural and management practices (or GAAMPS) are intended to provide uniform, statewide standards and acceptable management practices based on sound science.

These practices can serve farmers in the various commodity groups to compare or improve their own managerial routines.

GAAMPS are based on the core principle of stewardship, and regardless of the growing methodology chosen by the individual farmer — from organic to biotech —we have common ground: the economic, social and environmental sustainability of Hawaii's agricultural community. To achieve those mutual

### West County Farm Bureau 94-403 Ukee Street Waipahu, Hawaii 96797

### **TESTIMONY**

Committee on Agriculture Rep. Clift Tsuji, Chair Rep. Mark Hashem, Vice Chair

Wednesday February 10, 2012 TIME: 10:30 am PLACE: Conference Room 312

RE: HB 1947 HD1 - Relating to Agriculture

Chairperson Tsuji, Vice-Chair Hashem and Committee Members,

My name is Phyllis Shimabukuro-Geiser and I am an egg producer and Chairperson of the Government Affairs Committee for West County Farm Bureau on Oahu. West County Farm Bureau represents vegetable and livestock farmers, ranchers and aquaculture farmers from the Waianae Coast, Central Oahu and the North Shore of Oahu. We support the intent of HB 1947 HD1 with comments.

We believe voluntary participation in the proposed certification process is the best incentive and food safety certification and surveillance of the agricultural industry should be conducted by the Hawaii Department of Agriculture for the production of food. The cattle and egg industries have their respective animal care guidelines and quality assurance plans. These existing programs reflect generally accepted agricultural practices (GAAMP) that ensure quality animal care and food safety. We recommend these programs or plans be recognized as equivalent to the proposed certification process of the agricultural safety and security program if this bill becomes law. The egg industry is regulated by the US Food and Drug Administration. We are concerned that the proposed certification program of HB 1947 HD1 does not interfere and subject our producers to two layers of inspection for both the state and federal governments. We request the proposed farm inspection and certification process assure participants their data and records will be held confidential and use solely for the certification procedure.

We share your concern for food safety and some of our livestock industries have been proactive with voluntarily implementing their GAAMPS through established animal care guidelines and quality assurance plans for the production of high quality and safe food for our consumers.

Thank you for the opportunity to provide testimony on HB 1947 HD 1.



To: House Committee on Agriculture February 9, 2012

Re: Hearings on February 10, 2012, 10:30 am, Rm #312

Subject: Testimony regarding HB1947

Aloha Committee Chair and Committee Members,

I am a small farmer advocate and co-owner/operator of three farmers' markets on O'ahu. Please accept my testimony opposing HB1947.

**HB1947 strongly oppose** 

While we all agree that food safety is an important issue and deserves our attention, this bill is not the best solution. The expansion of Food (or Agricultural, as it has been renamed) Safety Certification at the farm level does not address where history shows the problem of potential hazard of contamination lies- in processing. Requiring all farmers to undergo 3rd party food safety certification will result in the loss of the vast majority of Hawai'i's small family farms. At the national level, the Food Safety and Modernization Act includes the Tester Amendment, exempting the small farmers who sell directly to the consumer. This HB1947 is overreaching and gives no consideration to these small farmers. We cannot expect that the agricultural practices that work in Michigan are applicable to Hawaii. We have a unique ecosystem. The establishment of Good Agricultural Practices as set out in HB2065 will protect the farmers from mainland corporate food safety certifiers whose certification template does not take into account Hawaii specific and science-based practices.

Sincerely-

Annie Suite Ala Moana Farmers' Market Hawaii Kai Farmers' Market Hale'iwa Farmers' Market

From:

mailinglist@capitol.hawaii.gov

3ent:

Thursday, February 09, 2012 5:17 PM

To:

AGRtestimony

Cc:

pamelaboyar@gmail.com

Subject:

Testimony for HB1947 on 2/10/2012 10:30:00 AM

Testimony for AGR 2/10/2012 10:30:00 AM HB1947

Conference room: 312

Testifier position: Oppose Testifier will be present: Yes Submitted by: Pamela Boyar

Organization: Hale'iwa, Hawaii Kai, and Ala Moana Farmers Market

E-mail: pamelaboyar@gmail.com

Submitted on: 2/9/2012

#### Comments:

I oppose HB 1947 for the following reasons. Our corporation works with 50 small family farmers. The farms range from 1/2 acre to 40 acres. These brave farmers work on very little mark up as the cost of farming is prohibited on Oahu. With loans to pay back, equipment to fix, the cost of labor, failed crops it is a wonder they continue to farm. This bill will add extra expenses to the small farmers that they will not be able to cover. The paperwork alone will require another person on the payroll. Some of the farmers english is not proficient enough to even understand what is required of them. I have worked with small farmers for 30 years and they all have and know GAP. This is their business, their livlihood, why would they not practice GAP. In the 30 years I have worked with small farmers, I have never known anyone to get sick from their food. I can count how many times big ag has made people sick through unconscious handling of product. Most illness comes from processing, not the farm. This bill, VOLUNTARY OR NOT, if passed will be the end of small family farms on Oahu. I beseech all of you on this ag committee that serves the people to ask Rep Tsuji to oppose this bill and kill it.



Testimony Reference :HB 1947

Date of Hearing: Feb 10..... Agriculture

From: BIG ISLAND CHAPTER....Hawaii Farmers Union United

**OPPOSE** with comments

Testimony Reference :AG Committee HB 1947

#### **OPPOSE**

I am Glenn Martinez, President of Hawaii Farmers Union speaking on behave of the BIG ISLAND Chapter. Most of the committee members heard my name when the Farmers Union championed the VETO of HB667 in 2011.

Testimony: We support the intent of the HB 1947 bill to provide a Hawaii-based Certification program to serve the needs of the farmers in Hawaii who are being pressured to become "Certified Farm Safe"

We were successful in our campaign in 2011, and the Governor Vetoed HB667 and stated three reasons 1) It lacked rule-making authority 2) it lacked funding 3) it caused such dissension among the farmers.

In the process of obtaining the veto of HB667, many commitments were solicited from the farmers, in short if they got the veto, would they come to the table and cooperate in writing a Farm Food Safety bill that would empower a state agency to organize and operate a Farm Certification system for the benefit of local farmers. There has been much discussion as to whether the Food Certification system should reside under DoA or the Department of Health. Many farmers feel more comfortable with the Dept of Health. For those farmers that have crop prep kitchens, packing or processing facility, they are already doing business with the Depart of Health. The other problem is conflict of interest, the farmers are leasing from DoA and now the DoA is going to be inspecting them. It is feared that in the near future DoA is going to require all leases growing food to be "Food Farm safety Certified".

The agreement to meet and work on a "Certification" bill" was made and has been honored. For the past many months a group of farmers and stake holders has been meeting with the

HB 1280 says

Food Safety; Farms

Description:

Requires any person who grows edible farm products to successfully complete a

Third Party Food Safety Audit through the Department of Agriculture to join an

agricultural association, organization, or cooperative.

Farmers are realizing that the "Farm Food Certification" could quickly dis-enfranchise the farmers in legislative descriptions. In short if they are not "certified" they are not real farmers.

Dean Okimoto told me that 85% of the farmers in Hawaii are on less than two acres of land. A bill like HB 1947 would cripple the vast majority of farmers in Hawaii.

The other MAJOR fact is that there is no sense in setting up the Department of Agriculture to be the clearing house for Food Farm Certification.....as we have witnessed, in the last RIF and recession, the Dept of Ag lost so many inspectors, and so much funding that they have not been able to perform their core functions of inspecting for invasive species or inspecting crops for shipping out (coffee). Why tie the farmers and the success of our agricultural system to a failed regulatory model?

The Farmers Union has been very supportive of legislation to fund and support the Dept of Ag to perform its core functions, but we do not belief they have the expertise, talent or will to build a viable Farm Certification program.

Please stop this bill from going further.

Thank you for the opportunity to speak for the family farmer in Hawaii.

Glenn Martinez, HFUU President Speaking for the Oahu Chapter of HFUU

FYI: Hawaii Farmer Union United is the largest agriculture organization in the State of Hawaii that represents the small family farmers, GMO and mega corporate, monocrop industrial farms. With small family farmers on every island, Hawaii Farmers Union is the only State-wide grassroots farm organization where the members have a direct voice.

Any testimony given to the Legislature is vetted to the membership. Often the testimony is a blend of opinions voiced directly from membership. We also encourage all individual members to submit testimony directly, particularly where their voice is different then the majority. Thus all farmer voices are heard, not just the loudest.

Thank you for the opportunity to speak for the family farmer in Hawaii.



Taste Winner Tomatoes



# LATE TESTIMONY

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sigwavetomatoes@gmail.com>

### **COMMITTEE ON AGRICULTURE**

Rep. Clift Tsuji, Chair Rep. Mark J. Hashem, Vice Chair

HB 1947-HD 1 HEARING Friday, 10 February, 2012 09:00 am, Conference Room, 312

Aloha Committee Chair and Committee Members,

09 February, 2012

My name is Jeanne Vana, I have been in the Agriculture industry for 30 years in Hawaii, since graduating with two Ag degrees. I am a small boutique specialty grower with a small family farm and loard Member of The Waialua Farmers Cooperative where over 60 other small farmers nearing retirement age, work cooperatively together as independent farmers on, 1- 2 acres size lots within the Coop's 150 acres of leased farmland, to supplement retirement income after the demise of sugar and pine. THIS BILL CONTINUES TO THREATEN OUR LIVEHOODS. WE STRONGLY OPPOSE THE INTENT of this bill. This bill, like all the other food safety bills, in my opinion, paints a big ag picture for Hawaii's food safety plan, with no place or room for the small farmer.

My farm was food safety certified, 3<sup>rd</sup> party auditted in 2010. I am unable to continue to farm nor participate in either a certification-audit program (or "generally accepted agricultural management program" it all means the same), due to a 20% increase in operating costs, which I am unable to recoup by passing on the additional costs to customers, as customers are unwilling to pay higher prices for local produce. As a result, I will no longer be able to continue to farm and I predict, this will be replicated throughout Hawaii so unnecessarily. Why? Because small farmers that sell direct are the front line advocates of providing safe food to the marketplace because we are accountable to our face to face customers when they buy direct from us, we must be, as we depend on building our small business by repeat customer sales, week to week. We accomplish this by building a relationship with them, promoting the Buy Local Campaign and the whole Farm to Table movement, through our direct to consumer produce sales.

As of this writing, as an example, nearly 50% of farmers produce at KCC Saturday farmers varket will no longer be able to sell produce, as a result of not meeting a food safety mandate 3<sup>rd</sup> party audit standards, effective March, 2012. For the most part, it appears, KCC will have their Culinary Food Market, with the majority of vendors under Hawaii Department of Health rules.

⊂rom:

mailinglist@capitol.hawaii.gov

Sent:

Thursday, February 09, 2012 10:18 PM

To:

**AGRtestimony** 

Cc:

hiraokal001@hawaii.rr.com

Subject:

Testimony for HB1947 on 2/10/2012 10:30:00 AM

Testimony for AGR 2/10/2012 10:30:00 AM HB1947

Conference room: 312

Testifier position: Oppose Testifier will be present: No Submitted by: Lucy Hiraoka Organization: Individual

E-mail: hiraokal001@hawaii.rr.com

Submitted on: 2/9/2012

Comments:

TESTIMONY In reference to the measure before the Hawaii State Legislature on HB 1745571MONY

### IN OPPOSITION:

My Name is Michael G. Chang, I've previously stated my opposition to this Bill with regard to the impact it will have on small farmers. I will oppose this bill if it does not specifically exempt small farmers or make it voluntary.

Small farmers who farms reside within, 175miles of their markets, are direct suppliers to vendors and make less than \$175,000/yr.

The current set of Agriculture and Board of Health are well known and well enforced by the current field of inspectors. These standards are also well known by the immigrant farmers such as my father-in-law.

If the provisions above are mentioned and maintained in this bill, it will have my support and my father-in-laws support and the 15 farm hands and family members employed by it.

Mahalo for your time

### From Mary Barter, and David Barter HFU



To

Committee on Agriculture Hearing for HD1 of HB 1947

Time: 10:30 A.M.

Place: conference Room 312 State Capitol 415 Beretania St. Request: 11 copies to rm 312

We strongly oppose the proposed legislation which puts an additional burden on small farmers of increased paperwork, interfacing with regulators, and fees they can ill-afford.

This is especially true for small farmers who need to spend their time in the fields, especially organic farmers that have an increased workload and much greater hands-on involvement with the food they produce, in order to do composting, to make and use natural fertilizers, and keep the essential close eye on what is happening on the ground.

Even making this a voluntary program is unacceptable, as larger growers can afford the fees and extra work to document compliance, and will be more likely to become certified and thus will seem to be safer by virtue of the certificate, even though they may not be. This will be confusing to the ill-informed consumer who will assume the certified farm's food is always safer i.e. "better'.

The State of Hawaii also should not enact any laws with higher standards than those required by Federal law as this one does. This bill is unnecessary and onerous and sets back Hawaii's progress on the goal of feeding ourselves. This is a very good idea if you want to kill off small farms.

Lastly, this bill is so vague and puts so much vague power in the hands of state employees- power that belongs in the hands of the farmers. Why make small farmers pay for a government jobs program for persons who, it sounds like, will not be well-trained or knowledgeable enough to make a correct, if not 'by the book", judgement in the field?

Sincerely, Mary and David Barter

From:

mailinglist@capitol.hawaii.gov

Sent:

Friday, February 10, 2012 7:32 AM

To:

AGRtestimony

Cc: Subject: warrenmcfb@hotmail.com Testimony for HB1947 on 2/10/2012 10:30:00 AM

Testimony for AGR 2/10/2012 10:30:00 AM HB1947

Conference room: 312

Testifier position: Support Testifier will be present: No Submitted by: Warren Watanabe

Organization: Maui County Farm Bureeau

E-mail: warrenmcfb@hotmail.com

Submitted on: 2/10/2012

### Comments:

We are in strong support of this measure. Hawaii's farmers must have a process in place before the federal rules are enacted. HDOA is the agency to oversee on farm activities, not HDOH. Too often agriculture has been regulated by agencies unfamiliar with our practices resulting in harming instead of helping agriculture.

From: Sent: mailinglist@capitol.hawaii.gov Friday, February 10, 2012 8:15 AM

To:

AGRtestimony

Cc: Subject: gleafs@hawaiiantel.net Testimony for HB1947 on 2/10/2012 10:30:00 AM

Testimony for AGR 2/10/2012 10:30:00 AM HB1947

Conference room: 312

Testifier position: Oppose Testifier will be present: No Submitted by: Bill Greenleaf Organization: Individual

E-mail: gleafs@hawaiiantel.net

Submitted on: 2/10/2012

### Comments:

Hawaii Farmers Union United 2/9/2012

My name is Bill Greenleaf, Partner Greenleaf Farm I am a member of Hawaii Farmers Union United I'm on Maui and I asked Natalie Cash to testify for me.

Dear Chairman Tsuji, Vice Chairman Hashem and Agriculture Committee Members: I am commenting on HB 1947 to be heard Feb, 10, 2012 I request 5 copies be given to the committee

As a local small farmer (sales near \$32,000) I strongly oppose HB 1947. Hawaii Farmers Union met with other local growers and HBFB last summer to develop language for a bill. The language in HB 2065 and SB 2027 reflects agreement in those meetings. HB1947 does not represent the work at those meetings or the needs of local scale farmers.

HB1947 is a one size fits all, scare tactic risk comments, restrictive of public involvement language in HB1947 would have a negative impact on the future of local agriculture in Hawaii.

For Hawaii to become Food Secure, thousands more small scale farms need to develop. That is only possible in a legislative environment that is not burdensome with costs and paper work.

Food Safety on small farms comes from education of the farmer and consumer. Compliance on a 2acre, 5 acre permaculture, or smaller scale farm has very few threats or risks from food production. HB 2065 and SB 2027 have mechanisms to identify HI-Good Agricultural Practices which will work in the local grower scale of farming that is threatened by HB 1947.

I further oppose HB1947 on research that I've done investigating compliance requirements for larger growers who have been through a Primus style audit. Primus is a 3rd party certifier. The amount of record keeping required for my nearly zero risk farm would require me to hire a 1/2 time person which would cost over \$20,000 and at that point make my sales of \$32,000 a worthless project for my wife and myself. I would just feed myself and stop selling. I'm quite sure other local growers would be in the same dilemma. I can't imagine a large number of young people entering farming to make a living with the reality of unreasonably costly Food Safety Certification reporting requirements.

Think of it this way. Local growers look their customer in the eye and eat the food themselves. What greater motivation do we need to produce healthy, delicious, nutrient dense food? Do we belong in the one size fits all category of Food Safety Reporting requirements

as large farms that never meet their customers becausetheir food is shipped great distances to market. Farms of that scale will be regulated by FSMA and market place requirements of Costco, Safeway, etc.

In Hawaii, 2000 miles from anywhere, we need a vibrant local farming community. Please do everything in your power to foster a healthy environment for local farmers. I request you start by voting down HB 1947. Support HB2065 and SB 2027.. This is for the people of Hawaii. HB1947 will not make local food safer, it will make it more SCARCE.

Sincerely, Bill Greenleaf Greenleaf Farm Hawaii Farmers Union United