

**Local Food Access--PRIME Act H.R.2657/S. 1232; interstate transport of raw dairy; urban agriculture
Considerations submitted by Real Food Consumer Coalition, Organic Consumers Assoc. and Organic and Natural Health Assoc.
September 26, 2018**

Co-Sponsor the PRIME Act H.R. 2657 and S. 1232

Custom slaughterhouses are an important link in the farm-to-table chain. Currently, farmers can only use custom slaughter houses if they sell the whole animal before slaughter--either by the whole, half or quarter part. If it is safe to eat if consumers pay for it all at once, it is still safe to eat if they pay for it by the cut.

1. The bipartisan PRIME Act introduced by Reps Chellie Pingree and Thomas Massie is a bipartisan bill, with 22 co-sponsors, that creates an exemption for farmers to sell their meat intrastate when that meat is slaughtered and processed at a custom slaughter facility.
2. Custom facilities are subject to state regulation and inspection to meet all food safety standards.
3. Custom facilities support local economies by offering skilled employment opportunities.
4. Artificially increasing farmers costs by requiring slaughter at USDA facilities means higher costs for consumers. This system is biased against lower socio-economic populations.
5. 50 years ago, there were over 9,500 slaughterhouses. Today, there remain about 1000 federally inspected slaughterhouses. Of these, about 200 process 90% of the meat produced.¹
6. The Government Accountability Office cites centralized production as a leading factor in foodborne illness.²

Conclusion: The passage of the PRIME Act will offer a safe means for farmers to process their meats locally to serve existing customers. This will lower costs for farmers and consumers.

Sign on to the Smucker-Pingree letter to FDA Commissioner Scott Gottlieb in support of interstate transport of raw dairy products.

The exemption outlined in the letter will boost rural economies and create jobs by providing a means for rural dairy farmers to offer their products to urban areas empowering American farmers to produce valuable products that American consumers seek. It is imperative that, as free Americans, we can choose the foods we need.

1. Demand for fresh milk and fresh milk products is increasing exponentially, especially in urban areas. This exemption would allow farmers who sell in their own states to continue to do so while safely increasing their market to consumers out of state.
2. This slight change in policy will conserve resources spent on aggressive enforcement of the interstate ban on raw milk intended for human consumption 21 CFR § 1240.61
3. Recent raids on farmers, cooperatives and buying clubs are an egregious use of force against America's small farmers and those who depend on them. These raids are a disservice to the taxpayers and an appalling misuse of funds, especially during difficult economic times.
4. Recent studies, including a new one from Canada, show the relative safety of raw dairy products.

Conclusion: Raw milk prohibition does a disservice to Americans on several levels. We ask that you sign on to the letter in support of the exemption.

Consider the needs of small produce growers and urban agriculture communities

While there is not current legislation pending on this topic, we ask that you remain aware of the disproportionate expense of Food Safety Modernization Act compliance against small farms. It can be as much as 2000% more expensive for small farms to comply with these, often unnecessary, regulations.

Urban agriculture is a growing means of food security, community development, and greening of city spaces. These are important aspects for our increasingly urbanized community. Please consider these points in every policy addressing them.

¹ <https://www.bloomberg.com/news/articles/2017-05-23/there-aren-t-enough-slaughterhouses-to-support-the-farm-to-table-economy>

² https://www.gao.gov/highrisk/improving_federal_oversight_food_safety/why_did_study