



COMMUNITY ALLIANCE
WITH FAMILY FARMERS

April 30, 2012

Honorable Mike Gatto
State Capitol, Room 4140
Sacramento, CA 94249-0043

Dear Assemblyman Gatto:

The Community Alliance with Family Farmers (CAFF) is a statewide organization that represents both farmers and non-farm urban residents who support sustainable food and farming policies. CAFF is pleased to support your AB 1616, which will clarify retail food safety laws as they relate to cottage food operators.

California has a requirement that all processed food be prepared in a commercial kitchen. This is a simple rule that is reassuring to the public health authorities. However, the availability of commercial kitchens is very uneven across the state. Particularly in rural areas, where many of our members live, there are few commercial kitchens and creating one at home is usually prohibitively expensive. This has given rise to unsanctioned cottage food processing and growing pressure to legalize these operations. With the recent rise of the local food movement throughout the state, many people in urban areas also want to be able to process and sell food from their homes. Support for local foods is centrally important to both CAFF's urban and farm members, who see great economic, environmental and public health benefits from a sustainable local food economy.

It is difficult for us to see the harm in the processing of non-potentially hazardous foods in home kitchens, particularly if they are sold directly to the public or to restaurants/food service. This would allow our farmer members who sell at farmers' markets, farm stands or through CSAs to include such products in their direct market sales and it would allow urban food purveyors to establish similar direct-market sales. This short supply chain both provides complete traceability and will limit the potential health hazards, and we should strive to impose as few regulations as possible on these direct sales. Since we are participating in a CDFA task force that is seeking to include CSAs in the direct marketing regulations, having a list of non-potentially hazardous foods that could be processed in farm kitchens and included in CSA boxes would be very useful.

Local health officials who are responsible for inspecting food production facilities have raised legitimate questions about whether they are obligated to inspect cottage food operations. While CAFF certainly wants to ensure a safe food supply, we also want to make sure it is done in a way that does not discourage cottage foods, which we believe have multiple benefits to local communities. We appreciate the way AB 1616 strikes a balance between these two goals, by defining direct and indirect cottage food sales and placing an annual income cap on producers

classified as cottage food operations. We doubt that the public wants to purchase cottage foods produced in uninspected home kitchens in their grocery stores, because they would lack direct knowledge of the producer. And people who want to sell more than \$50,000 a year can always go to commercial kitchens.

CAFF believes AB 1616 will eliminate uncertainty among both cottage food operators and local health officials so that they can work cooperatively in the future. It will also provide economic opportunity for farmers and small-scale urban food producers, which is of vital interest in these difficult times. For these reasons CAFF supports AB 1616 and looks forward to working for its enactment.

Sincerely,



David Runsten
Policy Director