

**Statement of Lane Osswald, Ohio Farmer  
and Trustee of the Ohio Farm Bureau Federation on behalf of  
Ohio Farm Bureau Federation  
280 N High Street, Columbus, OH 43215**

Hello, my name is Lane Osswald. I am a farmer from Preble County, Ohio. My family has been growing cabbage, bell peppers, and zucchini since 1980. We grow produce for the wholesale market which includes: restaurants, schools, hospitals, prisons and other similar institutions. We improved recordkeeping for GAP practices in 2007 and have been Third Party Audited annually. In 2013, we were certified for meeting the rigorous GAP requirements of the Global Food Safety Initiative Audit. I developed and wrote Osswald Family Farm's Food Safety Program and continue to update it as new requirements are presented.

Ohio is exceptional in both its production volume and diversity. Nationally, Ohio ranks second for fruit and vegetable processing, fifth for number of farmers' markets, and in the top ten for production of cucumbers, strawberries, apples, peaches and both processed and fresh tomatoes. This places Ohio growers in a unique position to offer perspective on new regulation.

Ohio Farm Bureau would like to thank FDA for its continued engagement with the produce industry, and asks FDA to consider the following concerns going forward:

Flexibility for different growing regions, practices and operations should be a continued focus. Unlike other areas, Ohio producers typically engage in all aspects of production, including growing, harvesting, packing, holding and shipping. Yet, FDA should also consider the likely situation where a grower may have to integrate produce not grown on their own farm to fulfill orders or demand after crop failure or weather disaster. Ohio is also home to a large concentration of Amish and Mennonite farmers who operate without electricity or traditional machinery. We appreciate the FDA considering the use of working animals in the fields, but stress the importance that this rule not disadvantage any producer simply because of operation style. The Ohio Farm Bureau urges the FDA to be mindful of these differences as the rule is further developed.

Also, of utmost importance, is the need to consider the economic burdens new regulation places on all growers. We emphasize the need to balance additional burdens with actual positive food safety impacts. Spending millions in compliance and enforcement to achieve little or no effect is unreasonable. Consider Ohio and many other states are disadvantaged by a shorter growing season over which to spread new costs of compliance. Further, all regulation must be based on food safety research demonstrating positive results. Economic viability, minimal burden, and proven impact to all industry structures, of all sizes and types, must be ensured.

Finally, enforcement should be facilitated at the state level through existing food safety agencies to eliminate redundancy. State agencies are best suited to address the growers and industry in their state. Ohio Farm Bureau urges FDA to consider coordinating inspections or enforcement activities through a state lead agency and ensure proper funding is provided in exchange for a state's time in enforcing federal programs.

Again, we thank FDA for their terrific outreach efforts regarding this rule making, and thank you for this opportunity to comment.