



Maximizing Engagement to Minimize Food Safety Risk

**Improving Training and Regulatory Impacts for Small
Processors, Producers, and Food Entrepreneurs**

***Report to the Michigan Department of Agriculture and
Rural Development – Food and Dairy Division***

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Executive Summary

This study investigated small food business owner and entrepreneur perceptions and experiences regarding Michigan Department of Agriculture and Rural Development (MDARD) food safety regulations. As MDARD revises Michigan Food Law, it seeks to understand and minimize the obstacles that regulations may present to small businesses, and it works to proactively increase the agency's accessibility to its clients. The study's findings and recommendations are summarized in this report and are intended to inform these efforts.

An online survey and a series of discussion forums conducted between February and April 2011 generated several key observations and recommendations. Observations are that: 1) The worldviews of small food business owners are different from those of MDARD staff. The world of the former is characterized by a diversity of possibilities and ideas, while that of the latter is organized in terms of statutes and jurisdictions. It is critical to understand this difference in order to better serve the needs of business owners and entrepreneurs. 2) Food business owners express confusion over the various licensing requirements that affect them. They indicate frustration over seeming inconsistencies in regulatory categories and jurisdictional boundaries. Distinctions between federal and state food safety, county health department, and local zoning laws are not always clear. 3) There is also confusion and frustration about rules affecting meat and poultry sales. Meat and poultry markets are limited by difficulty in accessing USDA-inspected facilities. Rules governing exemptions are not always clear.

Recommendations are that: 1) MDARD continue to engage a broader representation of stakeholders in rulemaking processes as well as attend meetings involving small businesses; 2) Staff training be expanded to help inspectors understand the worldview of small food business owners, improve communication skills, and increase consistency in implementing regulations; 3) MDARD continue to develop a user friendly website and program materials and seek user feedback when documents or website content are developed or updated; 4) Client needs be regularly assessed and strategic goals set to address these needs.

Findings from the online survey and discussion forums were similar to each other. Comments made during forums appeared to validate and elaborate survey results. The largest proportion of survey respondents were farmers, followed by roughly equal proportions of small food retailers, processors, and individuals exploring business possibilities. A large proportion had annual gross receipts of less than \$15,000 and sold products under the Cottage Food Law. Many respondents felt that they understood food safety regulations reasonably well. Approximately half indicated that regulations posed obstacles to their operations, and half did not. Half indicated that they were beneficial to operations, and half indicated that they were not. Discussion forum participants provided feedback and suggestions for clarifying the information that MDARD provides its clients and for improving inspector practices and inspections. They suggested changes to the Cottage Food Law and other food safety regulations, and they recommended improving communication within MDARD and between MDARD and other agencies.

We recommend that MDARD continue to seek input from small food businesses. A number of suggestions for future work emerge from the study, including a longer timeline for increased collaboration with partnering organizations, addressing practical issues that affected survey participation and completion, and identifying means of increasing forum participation.

Project Background

The Michigan Department of Agriculture and Rural Development (MDARD) is currently revising Michigan Food Law and has shown a clear desire to understand and to minimize the obstacles that food safety regulations may present to small businesses. For example, the Cottage Food Workgroup developed consensus recommendations on cottage food legislation and thus facilitated the enactment of the Cottage Food Law (CFL). The Small Business Workgroup is clarifying and revising sections of the Food Law relevant to small food businesses.

Through these efforts, the agency is proactively increasing its accessibility to these clients. When food establishments are represented in policymaking processes, they have the opportunity to discuss regulatory objectives and language, to help identify the practicality of implementing the proposed regulations within their own business, and to share their capabilities and perspectives. However, small businesses have fewer resources to allocate time and staff to do so. In addition, small businesses are impacted differently by food safety regulations. They have fewer resources to conduct product recalls, purchase ample liability insurance, and absorb the regulatory costs of doing business. In order to assist MDARD in understanding the obstacles and training needs faced by small businesses, Michigan Food and Farming Systems (MIFFS) and Michigan State University (MSU) worked in partnership to reach small business owners and understand their experiences with food safety regulation.

MIFFS has been working with small and medium size farm operators and food entrepreneurs for over 12 years. Through helping to create two incubator kitchens in the state and working to establish the Michigan State University Product Center for Agriculture and Natural Resources (MSU Product Center), MIFFS also has links to small interested and beginning food entrepreneurs. MIFFS also has experience working with MDARD to address regulatory issues that impact small farmers and food entrepreneurs, such as clarifying that direct sale of eggs at farmers markets does not require a license, facilitating a workgroup discussing access to fresh unprocessed whole milk, as well as helping to develop the Michigan Agricultural Environmental Assurance Program and serving on Generally Accepted Agricultural Management Practices workgroups. Because of these experiences MIFFS is able to reach the clients that MDARD would like to involve in the process of improving and revising the Michigan Food Law.

Our main objectives in this study were to:

1. Identify food safety training and educational needs of small processors, producers, and food entrepreneurs.
2. Identify small business owners' perceptions of food safety regulations.
3. Identify the impacts of food safety regulations on small businesses, including economic burdens and other obstacles.
4. Document other concerns expressed by small processors, producers, and food entrepreneurs.

Methods

In order to achieve the above objectives, we conducted an online survey of the target audiences. Survey findings shaped the content of the subsequent public forums in selected regions across Michigan.

A. Survey

Development. Survey questions were developed with the help of the MSU Product Center. Zoomerang online survey software was used. The survey was pre-tested by owners and/or staff of five small food businesses, who were asked specifically to advise on clarity and technical difficulties and to report the amount of time the survey took to complete. The survey was also reviewed by MDARD Food and Dairy Division personnel.

Distribution. The survey link was distributed through the following listservs and contacts: MIFFS, Michigan Farmers Market Association, Food System Economic Partnership, Detroit Eastern Market, MSU Product Center, Michigan Organic, EatLocalSWMich, Michigan Land Use Institute, Foodspeak, and the MDARD Food and Dairy Division. These groups were requested to send the survey link to other interested parties. The survey was also promoted in emails about the discussion forums that were sent throughout March. Approximately 4,000 food business owners received the link.

Availability. The survey opened on February 22, 2011, and was initially to remain open for one week. In order to continue to promote it at discussion forums throughout March, we extended it until April 11, 2011.

Analysis. MSU Product Center personnel assisted with survey analysis and provided us with the raw data in spreadsheet form for further analysis.

B. Forums

Locations. We initially selected five locations in the Lower Peninsula based upon regional concentrations of MDARD Food and Dairy Division licenses: Ann Arbor, Bay City, Big Rapids, Gaylord, and Portage. A sixth forum was added in Marquette on the initiative of staff of the Marquette Food Cooperative, who provided the venue and refreshments and assisted with practical arrangements and promotion.

Scheduling. Forums were held in March to allow business owners who are involved in agricultural activities the opportunity to participate prior to the growing season. They were scheduled in morning or evening based on project personnel schedules. Each forum was two hours in length.

Discussion. The discussion guide appears in Appendix B. Participants were given the opportunity to speak about issues of most interest to them. The discussions were directed and yet open enough for participants to raise issues we had not anticipated.

Recruitment. Forum locations, dates, and times accompanied the emails promoting the survey and also appeared at the end of the survey. Links directed participants to registration pages on the MIFFS website. Announcements appeared in the MIFFS E-newsletter, *MIFFS Minute*, and the February 2011 issue of *The Michigan Farmer* (circulation 13,000). In Marquette, our local partner, the Marquette Food Cooperative, promoted the project to its members and at events and distributed public service announcements to local media.

Participation. Forums were conducted in Ann Arbor, Bay City, Big Rapids, Gaylord, Marquette, and Portage. A total of 40 participants attended. They represented a range of operation sizes. Some were exploring business opportunities and had not yet begun earning income. The majority of businesses were farms, retail businesses, and small food processing plants.

Data. Notes were taken on flip sheets and subsequently typed into a computer document. Discussions were also recorded with a digital audio recorder in order to clarify notes as needed. Recordings were not transcribed.

Key Observations and Recommendations

A. Observations

We made several key observations during the study. This section highlights issues that emerged from the survey and forums. It also provides suggestions for MDARD action.

Differing Worldviews. It became apparent after several forum discussions that the worldview of the project participants, and possibly other MDARD licensees, is very different from those of the staff of the Food and Dairy Division and other regulatory agencies. The participants view their businesses and the business environments in which they work within the broader context of their work world, with regulatory requirements as one of many necessary components of doing business. Their worlds are characterized by a diversity of possibilities and ideas. In contrast, the worlds of agency employees are defined by the laws and rules which they apply to each regulated enterprise. The agency focus is on implementing the statutes and regulations within its jurisdiction. Thus, while the world of the regulator is organized in terms of statutes and jurisdictions, that of food business owners and entrepreneurs can be difficult to categorize in these terms. Food safety and other regulatory matters are readily apparent to agency personnel, but not necessarily to business owners and entrepreneurs. We emphasize that there is no judgment implied in this observation. Instead, it is critical to understand the difference in worldview to better serve the needs of the business owner and entrepreneur.

Participant Confusion. In both the survey and the forums, even people who had experience with licensing expressed occasional confusion about food operation licenses and seeming inconsistencies. Examples:

- There were cases in which one business was required to hold different licenses in order to market in one venue, depending on the way that MDARD categorized the business (e.g., warehouse, retail establishment, processor, etc.).
- Businesses were allowed to use an approved product in one venue but not another (e.g., sell chicken at a farmers market, but not use it in catering a benefit event).
- Business owners expressed confusion as to whether county health departments or MDARD had jurisdiction over their operations.
- Business owners building an on-farm market stand or new market facility expressed confusion with regard to zoning and building permit requirements and food safety requirements.

These examples point to the difference in worldviews described above. For food business owners, regulations are one of many components of their business operations. Regulations are not the sole focus. Business owners may have effective standard operating procedures for food safety, yet they also attend to the need to market their business, train staff to provide consistent, quality customer service, and set competitive yet viable prices for their products.

Emerging Concerns. Meat and poultry processing questions and issues were not anticipated but were raised by participants at each forum. Concerns related both to difficulty accessing USDA facilities in order to sell in the retail market, and to confusion over rules to follow in selling

products processed in exempt facilities directly to consumers, restaurants, and other buyers. Farmers who are interested in selling more rabbits, beef, or chickens lack a readily apparent means to obtain those licenses or access licensed facilities. With the recent federal decision to allow sales of state inspected meats across state borders, that interest and concern has increased.

B. Recommendations

While many of the findings in the survey and forums sessions could be addressed on a case-by-case basis, the above observations lead us to more overarching recommendations.

1. Continue to engage outside stakeholders such as food business owners and entrepreneurs and their representatives through the following measures. See also Suggested Regulatory Changes, p. 19, and Other Recommendations, p. 21.
 - a. Involve them in regulatory program review processes;
 - b. Obtain their input on new guidance documents, Frequently Asked Questions (FAQs) and user friendly explanations of regulatory processes and requirements;
 - c. Attend meetings involving regulated businesses: present on food safety requirements, develop a display on MDARD and other regulatory programs, and more importantly, engage in one-on-one conversations with food business owners and entrepreneurs in order to understand the questions and confusion that may arise over implementation of food safety standards.
2. Expand staff training to:
 - a. Include the worldview of the business owners and entrepreneurs whom they regulate;
 - b. Introduce communication skills or materials for explaining complicated and complex safety and regulatory processes in a manner that citizens and regulated businesses can readily understand;
 - c. Improve consistency in implementing regulations across regions or counties so that food safety laws and rules, such as the Cottage Food Law and new license application process, are being addressed consistently.
3. Continue to improve and develop a user friendly website and program materials to:
 - a. Update and improve navigability and consistency of website content;
 - b. Clarify guidance documents on production processes and regulations for ease of entrepreneur understanding;
 - c. Seek user feedback when documents or website content are developed or updated.
4. Set strategic goals to address identified client needs to:
 - a. Consistently review the questions received by phone or internet or in one-on-one conversations with entrepreneurs. Use this information to develop and implement strategies to address questions or confusion, such as through user friendly language and consistency in FAQ documents, guidance documents, and documents on the website;

- b. Recognize business owners for solving problems or identifying alternative methods for addressing food safety concerns. Efforts could include recognition among peers via email or at department or division gatherings;
- c. Survey the regulated community regularly to identify needs, confusion, emerging issues, and areas that are working well.

Table 1: Summary of key recommendations

Recommendation	Benefits to MDARD	Benefit to Business Owner/ Entrepreneur
1. Continue to engage outside stakeholders such as food business owners and entrepreneurs and their representatives	• Builds understanding of client worldview and trust • Identifies user needs and emerging issues • Establishes clear language for new statutes and rules	• Increases understanding of food safety risks • Builds relationships and trust • Improves knowledge about implementing food safety requirements
2. Expand staff training	• Improves consistency of regulation across work area boundaries • Builds staff skills and knowledge • Builds understanding of client worldview and trust	• Increases understanding of food safety risks • Builds relationships and trust • Improves knowledge about implementing food safety requirements
3. Continue to improve and develop a user friendly website and program materials	• Increases proportion of questions that are answered through available resources • Makes more efficient use of staff time when responding to information needs of food business owners • Reduces repeat inspections	• Improves ready access to understandable food safety information and requirements • Reduces questions for staff and inspectors • Increases knowledge about implementing food safety requirements • Improves business ability to pass an inspection the first time
4. Set strategic goals to address identified client needs	• Establishes measurable outcomes for food safety progress • Increases staff job satisfaction • Improves use of resources	• Expands opportunities for input and problem solving • Reduces questions for staff and inspectors • Increases knowledge about implementing food safety requirements • Improves business ability to pass an inspection the first time
Bottom line	Improved food safety programs for MDARD	Improved food safety knowledge and more effective food safety practices

Detailed Findings

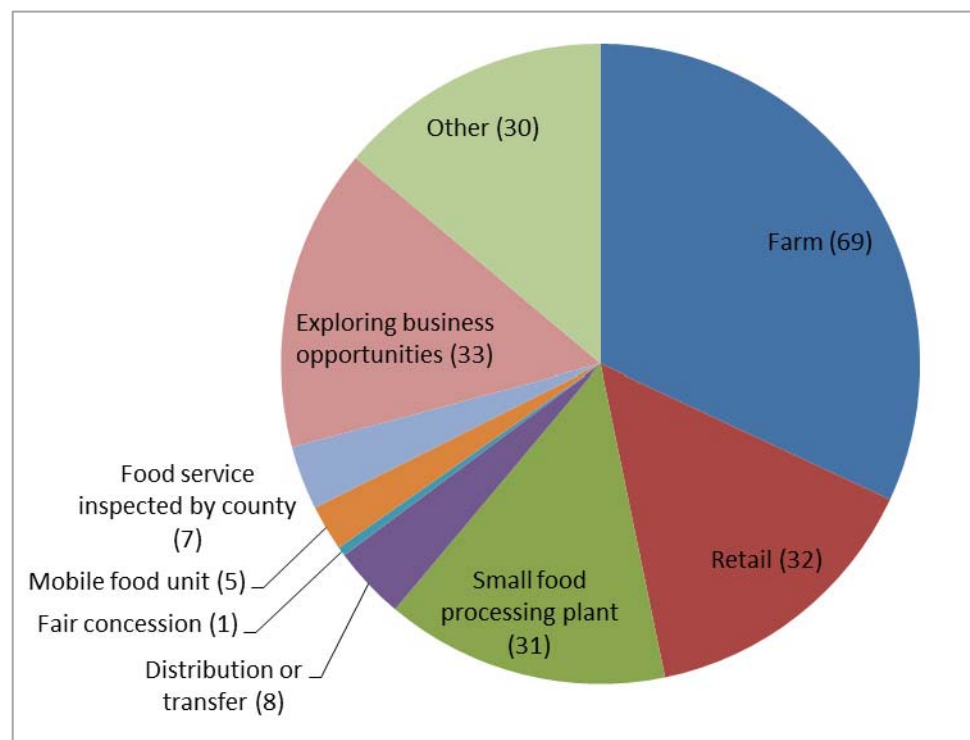
A. Survey

A total of 208 responses were received. Of these, 128 were completed and 80 were begun but not completed. Findings from completed surveys are summarized here. Not all respondents answered all questions. In the diagrams below, numbers in parentheses indicate number of respondents. “N” indicates the total number of respondents for each question.

1. The largest proportion of respondents were farmers, followed by roughly equal proportions of retailers, processors, and individuals exploring business opportunities.

Respondents could check more than one option.

N = 128



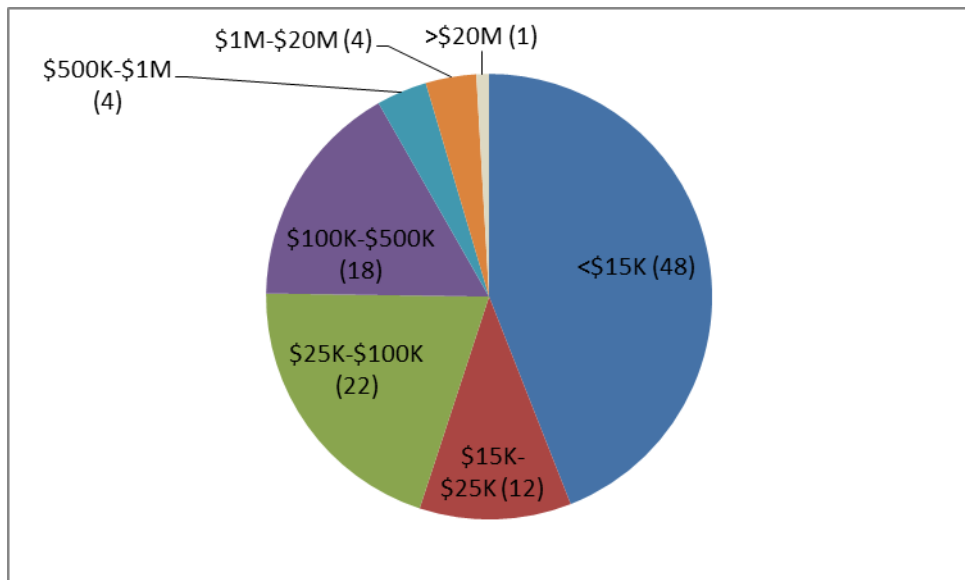
Businesses specified in the *Other* category included:

- market garden (1)
- permaculture business (1)
- small scale food production/processing* (9)
- food service (1)
- food and agriculture consulting business (3)
- exploring other possibilities (2)
- farmers' market (2)
- cottage food operation* (2)
- kitchen incubator (1)
- wastewater processing (1)
- cooperative (1)

* It is possible that the 2 cottage food and 9 small scale food operations should be categorized as *small food processing plants*, but respondents did not recognize their operations as *plants*.

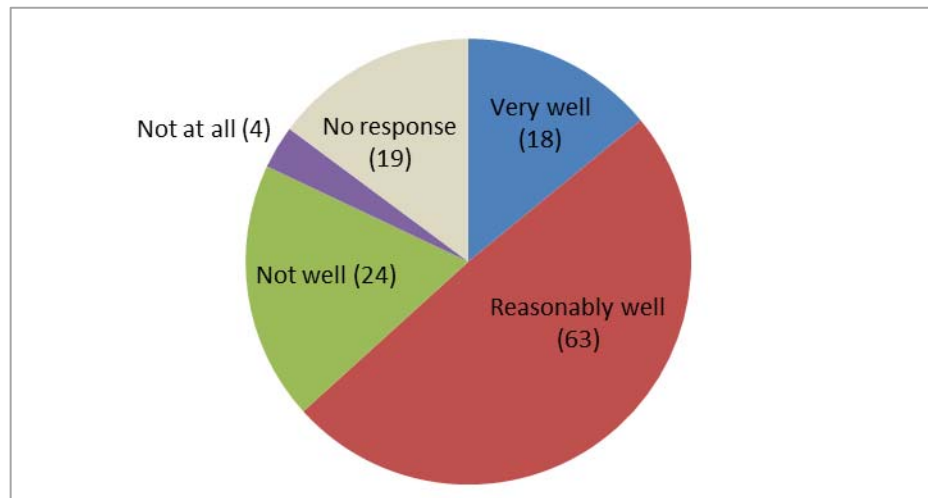
2. The largest proportion of respondents were very small, with gross receipts of less than \$15,000 per year.

N = 109



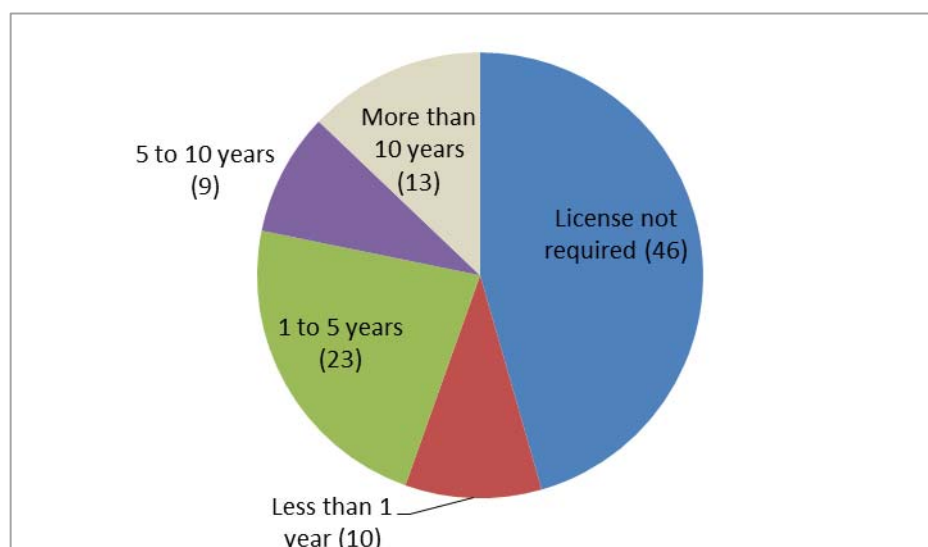
3. The largest proportion of respondents indicated that they understood food safety regulations reasonably well.

N = 128



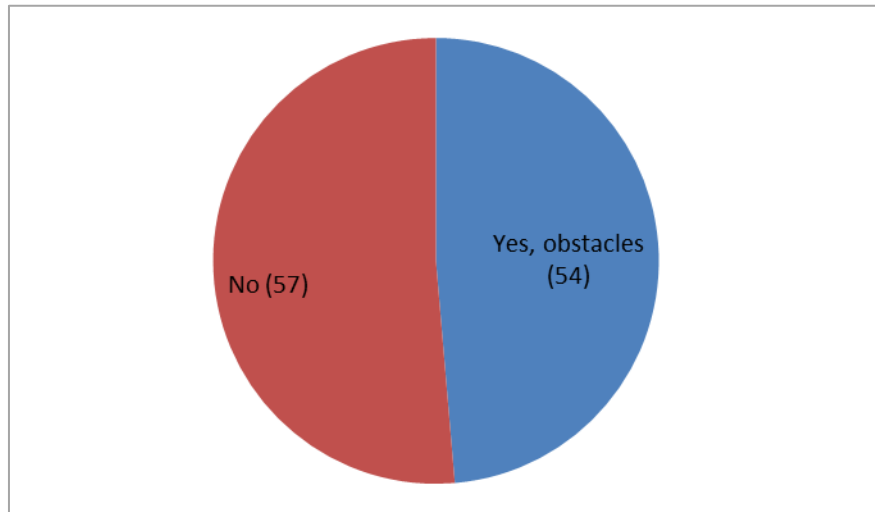
4. The largest proportion of respondents were not licensed, selling less than \$15,000 per year. Of those who were licensed, the largest proportion had been licensed for 1 to 5 years.

N = 101



5. Approximately half of respondents indicated that regulations posed obstacles, and half indicated that they did not.

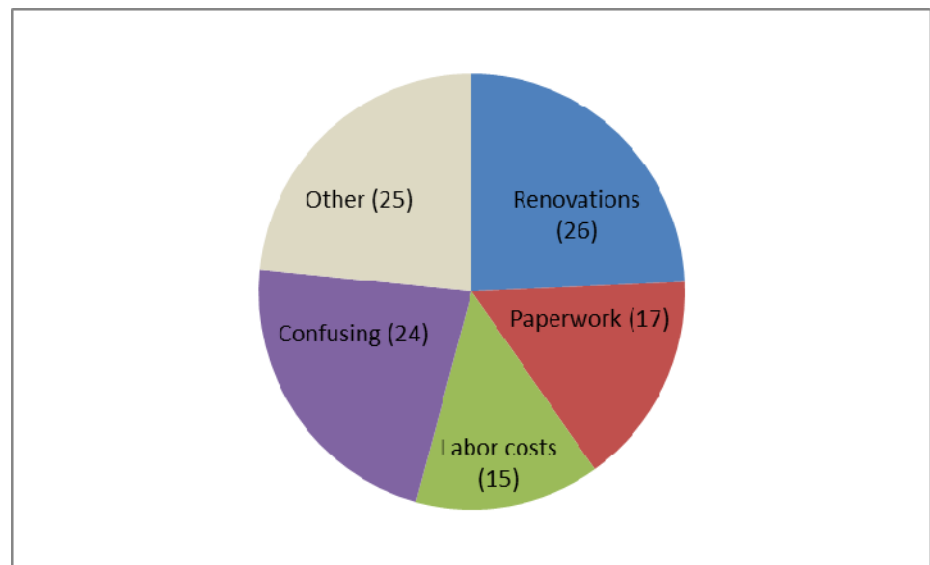
N = 111



6. The leading reasons that regulations posed obstacles were that they required renovations and that they were confusing.

N = 53

Respondents could check more than one option.



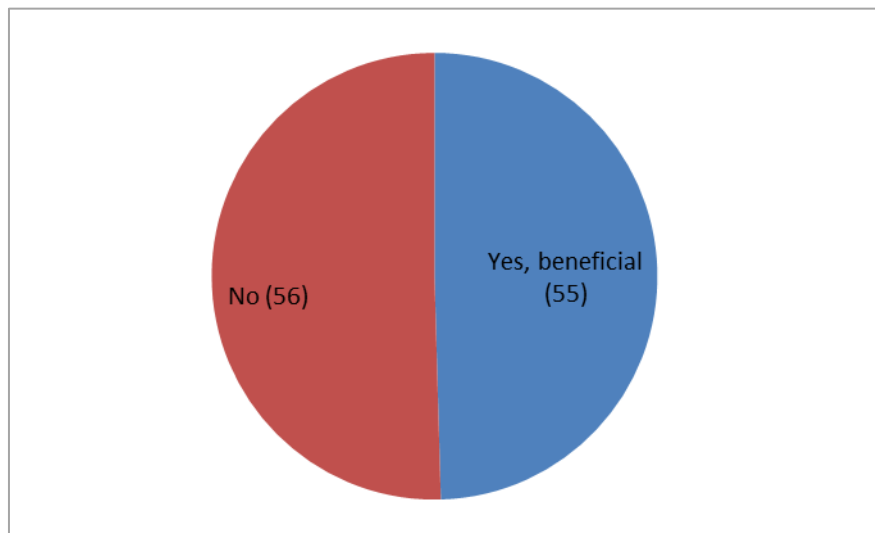
Obstacles specified in the *Other* category included:

- Inspections interrupt work.
- Inspectors do not have correct information on regulations, do not understand specific production processes (e.g., cheesemaking), or are hostile.
- Licensing process is costly and time consuming.
- Fees are high relative to gross sales.
- Label regulations and changes are costly.
- There is a lack of guidance on how to comply (e.g., finding the resources needed).
- The Cottage Food Law label indicating that products not made in an inspected kitchen has hindered sales.
- Information and requirements are confusing, vague, and/or inconsistent.
- Regulatory requirements conflict with some production methods (e.g., required use of bleach).

7. Approximately half of respondents indicated that regulations were beneficial, and half indicated that they were not.

N = 111

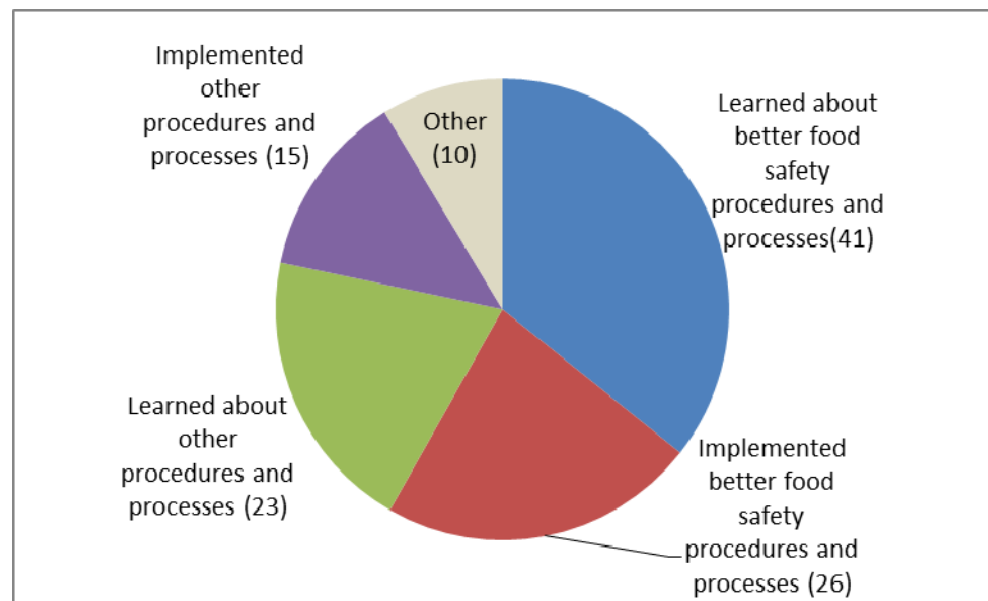
Of the respondents who indicated that regulations posed obstacles (see #5, above) 22 also indicated that they were beneficial.



8. Much of the benefit that respondents saw in regulations was through learning about food safety and other procedures and processes.

N = 54

Respondents could check more than one option.

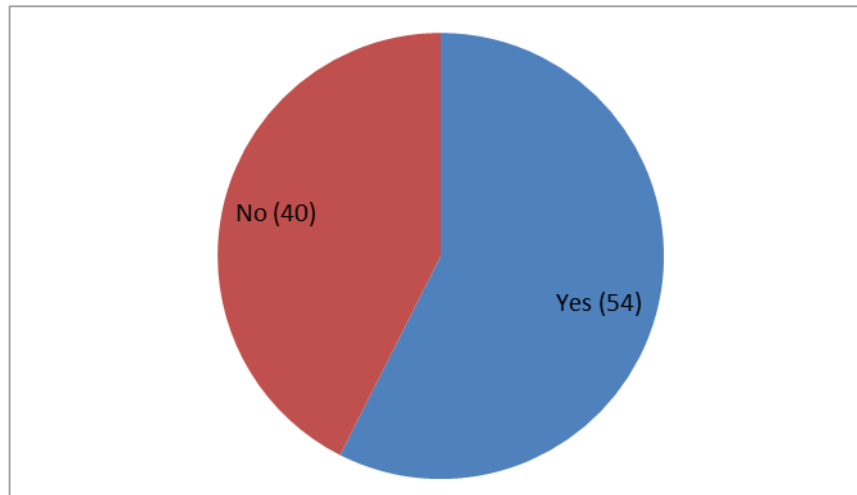


Benefits specified in the *Other* category included:

- The Cottage Food Law makes some respondents' operations possible.
- Regulations make producers aware of proper procedures.
- They lend credibility.
- The competition could not meet the regulations.

9. Over half of respondents indicated that the money they had invested to comply with regulations was reasonable.

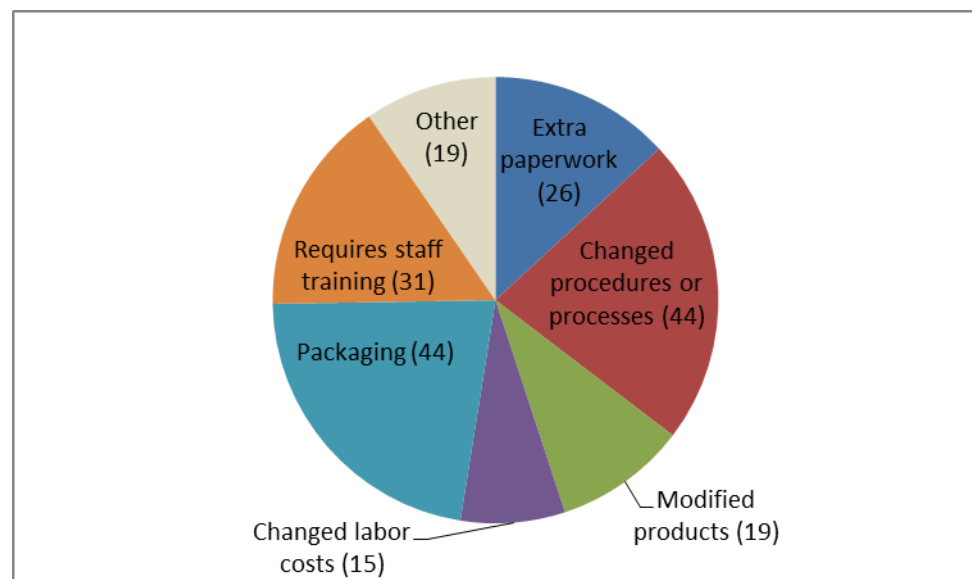
N = 94



10. Packaging and changed procedures and processes were the most common ways in which regulations affected daily operations.

N = 90

Respondents could check more than one option.



Comments in the *Other* category included:

- It is not clear how farmers market vendors should be educated about regulations.
- Regulations become a “way of life” in incorporating food safety practices into daily operations.

Some responses to this question reinforced similar points made above in other questions:

- Regulations require extra time and interrupt time-dependent labor.
- Regulations increase costs.
- Inspectors do not have current information or are inconsistent in enforcement.
- The Cottage Food Law is inconsistent in the products that it does and does not allow.
- Regulations prohibit business formation.
- Sales options are limited under the Cottage Food Law.

B. Forums

This section offers an overview of points made during discussion forums. We have incorporated as many of the comments and suggestions into this overview as possible. Not all suggestions appear in detail, but we hope that the overview conveys the spirit of the remarks.

1. Information Available to Producers

Food business owners and entrepreneurs indicated that they accessed regulatory information in a number of ways: through print documents, the MDARD website, and one-on-one communication with MDARD staff. Participant feedback on these three channels of information, both positive and negative, follows.

Table 2 and Table 3 summarize producer feedback on information sources that MDARD provides for regulations. A more detailed discussion of the comments follows the tables.

Table 2: Licensed food and dairy producer feedback on food safety regulation information sources

Information Source	Positive Comments	Suggestions
Print Documents	Non-MDARD publications are helpful.	- Regular newsletter updating producers on new regulations. “Starting Packet” for new business owners - Resource guide to locate testing labs, etc.
Web Documents	Much of the information that producers need can be found on the site, provided that they know where to look.	- Make the site easier to navigate intuitively. - Need specifics on day-to-day operations, such as pH numbers. - Need to remove out-of-date information. - Need to address discrepancies within the site and between MDARD and Michigan State University Extension (MSUE) sites.
One-on-One Communication	Inspectors are a good source of information on regulations.	- Provide a phone number for new business owners to call, ask questions, and work out ideas. - Clear up differences in interpretations of the law by different staff.

Table 3: Cottage food producer feedback on food safety regulation information sources

Information Source	Positive Comments	Suggestions
Web Documents	- Labeling example and FAQs are helpful. - Most information on which products fit under CFL is useful.	- Need information on fermented foods and on labeling small products (labels are too small for required information). - The list of foods that are not allowed includes: “Food products made with cooked vegetable products that are not canned.” This reference to canned vegetables is confusing. MDARD is requiring that any cooked vegetables be commercially canned, but the statement could be interpreted to mean that if a vegetable is home-canned, food products made with that vegetable are allowed. - There is confusion about the relationship between the honey and maple syrup exemption and the CFL. References to the honey and maple syrup exemption should be added to CFL FAQs.
One-on-One Communication	Speaking with other entrepreneurs.	MDARD inspectors need to be better informed about the CFL.

a. Print Documents

Neither licensed business owners nor cottage food producers had many comments on MDARD print documents. It is unclear if this is due to the fact that they do not access them or do not use them, or if there is another reason. More comments concerned MDARD’s web resources. This will be discussed in the next section.

A number of non-MDARD publications such as *Acres USA* and *Countryside Magazine* were mentioned as useful sources of information about food safety.

Suggestions for useful print documents included:

- A print or email newsletter that alerts business owners to recent changes in food safety regulation. Some participants indicated that they were not kept up to date on regulatory changes affecting them and learned of changes only during inspections, when inspectors informed them that they were not in compliance. They would prefer to have more information ahead of time so that they could be prepared.
- A “starting packet” for people interested in starting a business. It would describe the different steps one must take in order to become licensed, as well as sources of information to be able to complete those steps. Links to other useful resources could be included.

- Licensed business owners expressed interest in a document that compiled such resources as testing labs, slaughter houses, and places to find approved equipment, in order to facilitate compliance with the regulations. They want to comply with regulations but are not sure where to find the resources to help them do so, such as approved laboratories and slaughter houses.

b. Web Documents

Licensed business owners found the Ask an Expert link on www.extension.org to be quite useful. They were able to post a question and receive responses quickly. Others mentioned the EatLocalSWMich listserv as useful.

The majority of comments on the MDARD website were critical:

- Overall, most participants felt that the website was confusing and difficult to navigate. They felt that the Food Law was written in a language they could not understand, and some suggested a “For Dummies” section in which regulations were written in lay language. Many participants found it difficult to understand which licenses applied to their business. Others found that interpretations of licensing requirements differed between the website and inspectors. Those involved in farmers markets found pertinent information to be confusing. For example, they were not sure how to approach giving food samples at markets.
- Some participants wanted more specific information for day-to-day operations, such as exact pH numbers for the vinegar in their process, when and where in their process to wear gloves, which sanitizing solution to use, and guidance on how to create Standard Operating Procedures (SOPs) and recall plans. One participant struggled in developing a recall plan because the example that MDARD provided was for a much larger operation and was not applicable to the participant’s needs.
- Many wanted to see a section about proper food labeling as specific as the one on the CFL web page.
- Some participants found contradictions between the interpretations of the law on the MSUE website and the MDARD website. Several participants relayed frustration with outdated web information. For example, the MDARD website had directed one participant to a health department office for a processing license, but the office had been closed.
- Meat and poultry producers were confused about how to proceed with marketing, what exemptions applied to them, and where and under what circumstances they could market their products.
- Most cottage food producers found that the law was clear in terms of which products applied and which did not. They generally found the web material to be useful. They found the FAQs helpful. The advice that MDARD provides cottage food producers to keep organized records, even though they are not inspected, was appreciated. Producers also appreciated the web page that gives instructions on product labeling because it featured a visual example. However, they wanted to see examples of or alternatives on how to label products that are too small for labels containing a lot of information. Some participants also wanted to see

more information about fermented foods as they would like to see fermented foods included in the CFL.

c. One-on-One Communication

Overall, business owners found their inspectors to be among the most helpful individuals in the regulatory process. The inspection itself was often a learning experience, a point discussed below in the section on inspectors and inspections.

Negative feedback included difficulty in receiving a clear answer when the MDARD was called with a question, and differences in interpretation among MDARD staff. Newer producers felt they would benefit from a phone number to call with questions about many different aspects of the law. As indicated in the Key Observations and Recommendation section on page 6, this was particularly true of entrepreneurs whose ideas did not fit neatly into the defined categories laid out in the law.

Cottage food producers found it very helpful to talk with other entrepreneurs and business owners. Some participants suggested that though cottage food producers do not need to be inspected, inspectors should nevertheless be familiar with the CFL. This may be of particular importance in cases where a producer produces licensed as well as cottage food products.

d. Other Sources of Information

Producers found the following non-MDARD sources of information helpful:

- Education and networking at Kalamazoo Valley Community College's Ag Action Day.
- Workshops: Great Lakes Fruit, Vegetable and Farm Market EXPO; MIFFS; and MSU's Better Process Control School.
- Trade shows, for business information
- Specialty food shows
- Professional associations
- Other producers and entrepreneurs
- MSU Extension
- Webinars. A cautionary comment is that some felt that something is "lost" in webinars. If webinars are provided, they should be accompanied by personal contact information. Some felt that a good-sized group is essential to make a webinar more effective.
- Suppliers
- Buyers, such as one participant's Frito-Lay consultant
- Distributors

2. Inspections and Inspectors

a. Inspections

Producer feedback on MDARD inspections is summarized in Table 4. A more detailed discussion of comments follows.

Table 4: Producer feedback on inspections

Positive Comments	Suggestions
They are learning experiences.	- Pre-inspection training or checklist. - Mentorship from business owners who have already undergone the same type of inspection.
They prompted changes in standard operating procedures (SOPs).	- Guidance documents on SOPs for small-scale businesses. - Examples of SOPs for small-scale businesses on website.

Many participants saw inspections as a learning experience. However, some indicated that they were required to undergo multiple inspections before passing, an experience they felt they could have avoided with better preparation. In addition, inspectors sometimes raised new issues on repeat visits. To improve preparation, a number of participants suggested the following:

- A pre-inspection training or checklist.
- Mentorship from other business owners who had already undergone inspection. A list of business owners representing different types of businesses, and willing to serve as a resource for new business owners, would be extremely helpful. This would not only save frustration and time for business owners but would save inspection visits for MDARD.

b. Inspectors

Producer feedback on MDARD inspectors is summarized in Table 5. A more detailed discussion of comments follows.

Table 5: Producer feedback on inspectors

Positive Comments	Suggestions
- Inspectors are knowledgeable and helpful and want to see businesses succeed. - Inspectors offer suggestions rather than taking punitive approaches. - Building long-term relationships with the same inspector is helpful.	- Train inspectors on different types of products such as dried herbs and on CFL. - Train inspectors to explain to business owners why regulations are as they are and to describe alternative options when a business owner is doing something wrong. - Hire inspectors with practical experience in the food industry. - Train inspectors to enforce the law more consistently.

Most participants reported positive experiences with their inspectors:

- As indicated above, inspectors were their primary sources of information about MDARD regulations. Participants felt that inspectors cared about the success of their businesses, and they appreciated working with the same inspector over time to build a relationship.
- When inspectors were quick with responses and were helpful, it was a positive experience for business owners.
- Participants also appreciated inspectors who used potential code violations to instruct business owners on remedial options and better practices, rather than taking a punitive approach.
- Participants felt that experienced inspectors were invaluable MDARD staff and that inspectors often played a role in business development.

The negative feedback is essentially the inverse of comments of the above:

- Business owners felt frustration with inspectors who assessed fines and took a generally punitive approach rather than educate owners about mistakes.
- A major difficulty was that different inspectors had different interpretations of the law. One inspector would tell them one thing and another inspector would tell them something different. This was confusing and frustrating for business owners.
- In some participants' experience, an inspector changed his or her mind about a regulation between visits.
- Similarly, new details were sometimes added between a first and second inspection, reducing the business's likelihood of passing the second inspection.
- Some inspectors focused on certain aspects of food safety more than on other aspects. Business owners expressed frustration with these differing priorities among inspectors.
- Some inspectors enforced items that did not appear to be included in the written code.
- Inspectors seemed extremely busy, perhaps because MDARD is short-staffed.
- Some participants felt that inspectors did not have practical experience in food or agricultural business, making it difficult to communicate with them.
- Some inspectors were unfamiliar with some products, such as dried herbs, and with the Cottage Food Law.

3. Suggested Regulatory Changes

Producer comments on MDARD regulations are summarized in Table 6. A more detailed discussion of comments follows.

Table 6: Suggested regulatory changes

Licensed Food and Dairy Producers	Cottage Food Producers	Meat and Poultry Producers
• Make regulations flexible for smaller businesses. • Create a sliding scale for licensing fees. • Allow more flexibility with new recipes. • Do not require additional licensing of an already licensed kitchen. • Coordinate the regulations for selling at farmers markets, farm stands, and retail by the same producer.	• Include fermented and acidified foods. • Create an intermediate step between cottage food producers and licensed producers. • Allow cottage food producers flexibility with labeling similar to what larger businesses have.	• Reestablish MDARD's meat and poultry program. • Coordinate regulations for sales that a producer may make both at farmers markets and retail stores. • Include meat in Project Fresh. • Make regulations clearer overall.

a. Licensed Food and Dairy Producers

- Many smaller businesses felt that MDARD regulations were developed for larger businesses. The importance of some requirements, such as the number of sinks needed to meet regulations, was not immediately evident to smaller businesses. Smaller businesses would like to see regulations become more flexible to scale of operation. Participants also cited licensing costs as a hindrance. One suggestion was a sliding scale based on business income.
- Processors felt that the requirement to have each recipe laboratory tested was a hindrance. They wanted more flexibility, such as that which restaurants enjoy in changing recipes. This would allow them more creativity and expand their ability to market more products.
- Many small producers use restaurant kitchens. These kitchens are thus inspected an extra time—once as a restaurant, and once as a production facility. Producers are uncomfortable with the risk at which the additional inspection puts the restaurant owner. Inspections could be streamlined to prevent this double licensing of the same kitchen.
- Producers selling products at their own store, at a farm stand, and at a farmers market felt that there needs to be more consistency between the regulations affecting these venues. They found that there are differences in the regulations for selling the same products in different venues and would like to see more consistency.

b. Cottage Food Producers

Cottage food producers were overall very happy with the law. Suggestions include:

- Permit fermented and/or acidified foods to be sold under the law, as some other states do. Some urged MDARD to distinguish between fermented foods and acidified foods.

- Participants suggested that MDARD develop an intermediary category between cottage food products produced in home kitchens and licensed products produced in commercial kitchens, to allow cottage food producers to use commercial kitchens.
- Some cottage food producers found it frustrating that larger businesses were permitted to use the phrase “other spices” on labels while cottage producers were required to list all ingredients specifically.

c. Meat and Poultry Producers

Producers appreciated the fact that if a farm is MDARD inspected as an exempt facility under USDA regulations, chickens can be butchered and sold direct to the consumer. However a number of changes to existing regulations were suggested:

- The major suggestion here was that MDARD reestablish a meat and poultry program. There is a shortage of USDA slaughter and processing facilities, and producers sometimes need to go out of state for USDA facility processing to meet consumer demand.
- It was not clear to producers why rabbit is classified as poultry under the law.
- Some producers felt that regulations that permitted them to sell some meat products at farmers markets but not at their farm stores were inconsistent.
- Producers requested that meat be included in Project Fresh.
- Overall, meat and poultry producers found MDARD regulations to be confusing and felt that small-scale animal husbandry operations had unmet potential to provide employment in the state.

4. Other Recommendations

Two other major recommendations for change were to 1) improve communication among MDARD divisions and between MDARD and other regulatory agencies, and 2) improve MDARD regulations for small and/or diverse producers.

Producers found dealing with the variety of regulatory agencies to be sometimes confusing. They recommend improving communication between the offices and agencies involved in the food system, e.g., between the MDARD Food and Dairy Division office and field staff and between MDARD and the local health departments. Some found it difficult to know which agency to contact in regard to regulation. Some producers mentioned that working in multiple counties was difficult because they dealt with different inspectors concerning one license.

Overall, business owners felt that there was a lot of potential in improving regulation in order to help create a more diverse economy. As one participant expressed it, regulations are not evolving at the same speed as are producer innovations. Some producers felt that MDARD could do more to support incubator kitchens. Producers feared that if it seemed too difficult, unreasonable, or expensive to comply, small businesses might give up or simply violate the law. Producers specifically mentioned the dairy industry in Michigan, citing regulations and cost as prohibitive

barriers to entry for smaller businesses. Regulatory structures could encourage growth of the industry by lowering costs.

Producers wanted to have input into new regulations, particularly to address regulatory differences between large and small businesses. Current regulations, they felt, were suited to large businesses. They perceived a regulatory bias against traditionally produced foods and in favor of mass production.

C. Comparison of Survey and Forum Results

Overall, the feedback from producers in the survey and forums did not differ substantially. There were no major differences in the types of obstacles encountered or the information desired. Feedback from producers of different sizes and types was similar. More detail on individual experiences was obtained during the forums, helping to illustrate more clearly the concerns raised in the survey.

Suggestions for Future Studies

This study provided a number of learning experiences. The following suggestions may help inform and guide future MDARD studies.

A. Timeline

This project was initiated and completed within a six-month time frame. Future projects should allow 12 months to schedule forums to accommodate different audiences. For example, to involve producers, data collection should be conducted in winter and early spring months. The holiday season is busy for many small processors. A project that more fully builds a broad base of collaborators and local partners should therefore begin by the middle of the previous year. Forums should be planned further than one month in advance.

For the farmers and small-scale operators who responded to the survey, the preferred months for future forums and/or trainings were January through March. The least preferred months were June through October. There was a very slight preference for Mondays, followed by Saturdays. There was no marked preference for particular times of day.

B. Survey

1. Agency research should not be combined with university research in subsequent MDARD studies.

University research projects must comply with human subjects research consent processes, and we believe that this posed a significant barrier to survey participation. Per MSU requirements, the survey was prefaced with a consent document, reproduced on page 27. As indicated on page 9, just over 200 people responded to at least part of the survey. However, the survey site received over 400 visits. This indicates that approximately half of those visiting the survey viewed the consent form but did not proceed past it. The form may have deterred participation as many producers potentially did not understand the reason for it, felt mistrust, or felt that it was an extra step that required too much work.

We have a number of suggestions for improving the survey itself. We believe that the survey format may have led to the high number of incomplete surveys. We found that our survey software was incapable of the complex level of question hierarchy that we had planned for. Respondents were thus asked questions that may not have applied to them, leading to confusion and prompting many to quit the survey. We also recommend more thorough pre-testing to make sure that all possible response paths function properly.

C. Forums

We recommend several means of increasing participation in forums and of meeting the training and information needs voiced by business owners in this study.

1. Forums should be planned in collaboration with local partners. These may include local food groups, farmers markets, producer and/or business trade associations, and food cooperatives.

In this project, only the Marquette forum involved a local partner, and we enjoyed our highest attendance at that forum. Marquette Food Cooperative staff initiated contact with project personnel, and they were instrumental in recruiting participants and promoting the forum.

2. If pre-registration is available, registrations should be confirmed immediately.

Instead, confirmations were not sent until the week prior to the forums when participants were sent discussion materials. This may explain why not all registrants attended the forums. They may have thought the forum in question was not taking place, or they may have forgotten. We suggest confirming registration immediately upon receipt of participants' information, as well as sending a reminder along with relevant materials in the week prior to the forum.

3. If pre-registration is available, it should be optional, and prospective participants should not receive the impression that they must commit in advance to attending.

Prospective participants do not always know in advance whether they will be able to attend. If they are required to commit in advance, they may be reluctant to do so. In this study, we encouraged pre-registration, and links to registration forms appeared on the MIFFS website. However, some prospective participants interpreted the language instructing them to "register now" to indicate that registration was required, not optional. This may have been confusing and constituted a barrier to participation.

4. Discussion forums may enjoy increased attendance and meet food entrepreneur needs if they also feature trainings on regulations.

Many participants wanted training on regulations and expected to receive that at the forums. Because this was such a need for producers, we feel that combining a training session with a feedback session might 1) meet the high need for training for producers and 2) attract a more diverse group of participants who could give in-depth feedback on the regulations.

D. Other Suggestions for Future Studies

1. Project communication, recruitment, and survey work should not be primarily internet-based.

This project was conducted mainly online. An exception was in Marquette, where the local partner organization issued press releases and promoted the forum through word of mouth at its events. Although many food businesses make extensive use of online communication, not all do. There are also populations of producers, such as the Amish, who do not use computers. To conduct a research and outreach project solely using internet communication is to exclude many food producers, and it tacitly conveys the impression that the organizers are not as interested in these businesses. Budgets should allow for paper mailings and connections with conventional news media.

2. Project organizers should consider what types of discussion forum access to allow the media as well as identify participants who would be willing to talk to the media during or after forums.

In this study, the facilitator of the Marquette forum received a request from a local television news reporter to film some of the discussion and interview participants. In some respects, this presented a positive opportunity for publicity about the project, but it also presented challenges:

- Local colleagues confirmed that the tone of news coverage was likely to be positive, and that the reporter was likely to be interested in the community and economic development dimension of the story. MDARD staff agreed that coverage could be beneficial.
- At the same time, however, the forum's promotional information had not alerted participants to the possibility that the discussion would receive media coverage. The project's objective was to provide a safe environment for frank and open discussion. The facilitator relayed these concerns to the reporter and offered to speak with him, but informed him that he could not film the discussion. The reporter decided that these restraints would not generate enough of a news story, and he did not cover the forum.

3. Expanding the project to other members of the regulated community would require a longer timeline and different partners, such as the Michigan Restaurant Association and Michigan Retailers Association.

Acknowledgements

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We also thank our supporters and collaborators in this project:

- Dr. Jim Bingen and Dr. Wynne Wright, Michigan State University Department of Community, Agriculture, Recreation and Resource Studies
- Michigan State University Product Center for Agriculture and Natural Resources
- Michigan State University Extension – Bay County
- Michigan State University Extension – Mecosta County
- Natasha Gill, Sarah Monte, and the Marquette Food Cooperative, Marquette, Michigan
- All who participated in the survey and forums and who provided assistance in the project

Appendix A: Survey Questions

MDA Food Safety Regulation Survey

1. Participant Consent Form

You are being asked to participate in a research project on the views that small processors, producers, and food entrepreneurs have about food safety regulations, by responding to the survey that follows this screen. The project is funded by the Michigan Department of Agriculture (MDA) to identify food safety training and educational needs, small business owners' perception of regulations, the impacts of regulations on small businesses, and other concerns. You must be at least 18 years old to participate in this survey.

The survey will take approximately 15 to 30 minutes of your time, depending on the amount of detail you provide. You will have the option to skip questions. You will have the opportunity to review and revise your responses before submitting the survey.

Participation in this survey is completely voluntary; you have the right not to participate. You may change your mind at any time and cancel your participation in the survey. Information that you have already entered will be kept. You will not receive money or any other form of compensation for participating in this study.

The survey information will be used to develop reports and recommendations that will be shared with the MDA, Michigan Food and Farming Systems, Michigan State University Department of Community, Agriculture, Recreation and Resource Studies (MSU CARRS), MSU Product Center, and other food and farming organizations and interested individuals. It will also be used to plan forums on this subject to be held at a later date.

The survey is designed to minimize the risks you may incur in communicating your views on food safety regulations, and the researchers do not believe that your participation poses a reasonable risk to you. You will not be asked for information that you consider to be confidential or harmful. You are asked not to disclose information that is confidential; information that could harm your relationships with the above organizations or others; or information that could harm your reputation or harm you economically or legally.

If you have concerns or questions about this study, such as scientific issues or how to do any part of it, please contact the researchers:

· Dr. Jim Bingen, Professor, Department of CARRS, Michigan State University, 131 Natural Resources Bldg., East Lansing, MI 48824, 517-353-1905, bingen@msu.edu

· Jenifer Buckley, PhD Student, Department of CARRS, Michigan State University, 131 Natural Resources Bldg., East Lansing, MI 48824, 517-355-5962, jbuckley@msu.edu

You may print this form by clicking on your browser's Print button.

By clicking on the "Yes" button to begin the survey, you indicate your voluntary agreement to participate in this online survey.

- ☐ Yes
☐ No **[Skip to End]**

Thank you for participating in this survey on Michigan Department of Agriculture (MDA) food safety regulations. Although you may be regulated by more than one state or federal agency, please respond only concerning your experience with MDA regulations.

As you progress through the survey, you can change previous responses by using the Back button on your browser. You may need to re-enter responses that you "back" over.

2. Check one or more of the options that describe your type of food business.

- ☐ Farm
 - ☐ Retail
 - ☐ Small food processing plant
 - ☐ Food warehouse, distribution center or transfer station
 - ☐ State or county fair concession
 - ☐ Mobile food unit
 - ☐ Food service establishment that is inspected by a county health department
 - ☐ I am exploring food business opportunities
 - ☐ Other, please specify
-

3. Retail Food Businesses: If you indicated in Question 2 that you have a retail food business, please check one or more of the options that describe your type of retail business.

- ☐ Retail grocery store
 - ☐ Convenience store
 - ☐ Party store
 - ☐ Bakery
 - ☐ Fish market
 - ☐ Butcher shop
 - ☐ Candy store
 - ☐ Produce market
 - ☐ Other, please specify
-

4. Small Food Processing Plants: If you indicated in Question 2 that your food business is a small food processing plant, please check one or more of the options that describe your type of small food processing plant.

- ☐ Acidified food processor
 - ☐ Thermally processed low acid food processor
 - ☐ Ice, water, juice or soft drink plant
 - ☐ Winery, brewery, or distillery
 - ☐ Flour mill or cereal plant
 - ☐ Cider mill or juice processor
 - ☐ Maple syrup or honey house
 - ☐ Fish, fishery or seafood processor
 - ☐ Food salvage or reclamation center
 - ☐ Other, please specify
-

5. Food Warehouses, Distribution Centers or Transfer Stations: If you indicated in Question 2 that your food business is one of these, please check one or more of the options that describe your specific type of business.

- ☐ Food warehouse
 - ☐ Distribution center
 - ☐ Transfer station
 - ☐ Egg grading and packaging plant
 - ☐ Fruit and vegetable repacking operation or brining station
 - ☐ Other, please specify
-

6. Describe the status of this business:

- ☐ Currently operating [Skip to 8]
- ☐ No longer operating

7. Why are you no longer in business? Check all that apply.

- ☐ Sold business
 - ☐ Retired
 - ☐ Financial problems
 - ☐ Inadequate labor
 - ☐ Loss of market share
 - ☐ Food safety regulations required costly renovations
 - ☐ Food safety regulations required too much paperwork
 - ☐ Food safety regulations increased labor costs
 - ☐ Other regulatory issues, please specify
-

Skip to End

8. What size is your business (based on Gross Receipts)?

- ☐ Less than \$15,000
- ☐ \$15,001 - \$25,000
- ☐ \$25,001 - \$100,000
- ☐ \$100,001 - \$500,000
- ☐ \$500,001 - \$1,000,000
- ☐ \$1,000,001 - \$20,000,000
- ☐ More than \$20,000,000

9. Where do you market your products? Select all that apply.

- ☐ Michigan
- ☐ Nationally
- ☐ Internationally

10. What types of distribution channels do you use to market your products? Select all that apply.

- ☐ Direct in-person sales, including farm stand and farmers' market
 - ☐ Internet
 - ☐ Retail
 - ☐ Wholesale
 - ☐ Other, please specify
-

11. How have you learned about which MDA food safety regulations apply to your business?
Check all that apply.

- ☐ Michigan Department of Agriculture
 - ☐ Michigan State University (MSU) Extension
 - ☐ MSU Product Center
 - ☐ Michigan Food and Farming Systems (MIFFS)
 - ☐ Michigan Farmers Market Association (MIFMA)
 - ☐ Michigan Agricultural Cooperative Marketing Association (MACMA)
 - ☐ Commodity groups
 - ☐ Private for-profit training organizations
 - ☐ Other producers, processors, or businesses
 - ☐ Other online resources
 - ☐ If you answered Other, please specify
-

12. How have you learned about how to comply with MDA licenses and/or regulations? Check all that apply.

- ☐ Michigan Department of Agriculture
 - ☐ Michigan State University (MSU) Extension
 - ☐ MSU Product Center
 - ☐ Michigan Food and Farming Systems (MIFFS)
 - ☐ Michigan Farmers Market Association (MIFMA)
 - ☐ Michigan Agricultural Cooperative Marketing Association (MACMA)
 - ☐ Commodity groups
 - ☐ Private for-profit training organizations
 - ☐ Other producers, processors, or businesses
 - ☐ Other online resources
 - ☐ If you answered Other, please specify
-

13. How well do you understand the MDA regulations that apply to your business?

- ☐ Very well
- ☐ Reasonably well
- ☐ Not well
- ☐ Not at all

14. Please explain your thoughts regarding the clarity of MDA regulations.

15. How long have you had an MDA food license?

- ☐ License not required
- ☐ Less than 1 year
- ☐ 1 to 5 years
- ☐ 5 to 10 years
- ☐ More than 10 years

16. What MDA Food and Dairy licenses or regulations impact your business? Select all that apply.
(Please do not provide your license numbers)

- ☐ Cottage Food Law
- ☐ Food Establishment - Retail Food Establishment
- ☐ Food Establishment - Extended Retail Food Establishment
- ☐ Food Establishment - Wholesale Food Processor
- ☐ Food Establishment - Limited Wholesale Food Processor
- ☐ Food Establishment - Food Warehouse
- ☐ Food Establishment - Mobile Food Establishment
- ☐ Food Establishment - Mobile Food Establishment Commissary
- ☐ Food Establishment - State/County Fair Temporary
- ☐ Food Establishment - Special Transitory Food Unit
- ☐ Food Establishment - Temporary Food Establishment
- ☐ Dairy - Dairy Farm
- ☐ Dairy - Grade A Plant
- ☐ Dairy - Manufacturing Plant (including cheese and ice cream)
- ☐ Dairy - Grade A Milk Distributor
- ☐ Dairy - Grade A Transfer Station/Receiving Station/Tank Truck Cleaning
- ☐ Dairy - Grade A Single Service
- ☐ Dairy - Milk Tank Truck, Can Milk Truck
- ☐ Dairy - Milk Transportation Company
- ☐ Dairy - Milk Hauler/Sampler
- ☐ Dairy - Certified Fieldperson
- ☐ Other MDA food safety licenses, please specify

17. Have MDA food safety regulations presented obstacles to your business operations?

- ☐ Yes [Skip to 18]
- ☐ No [Skip to 19]

18. In what ways have MDA food safety regulations presented obstacles to the successful operation of your business? Select all that apply.

- ☐ Required costly renovations
 - ☐ Required too much paperwork
 - ☐ Increased labor costs
 - ☐ Too confusing
 - ☐ Other, please specify
-

19. Have MDA food safety regulations been beneficial to your operations?

- ☐ Yes [\[Skip to 20\]](#)
- ☐ No [\[Skip to 21\]](#)

20. How have MDA food safety regulations been beneficial to your business operations? Select all that apply.

- ☐ Learned about better food safety procedures and processes
 - ☐ Implemented better food safety procedures and processes
 - ☐ Learned about other procedures and processes
 - ☐ Implemented other procedures and processes
 - ☐ Other, please specify
-

21. Do you feel that the amount of money you have invested in order to comply with MDA food safety regulations is reasonable?

- ☐ Yes
 - ☐ No
 - ☐ Additional Comment
-

22. In what ways do MDA regulations affect your daily operations? Check all that apply.

- ☐ Extra paperwork
 - ☐ Changed procedures or processes
 - ☐ Modified products
 - ☐ Changed labor costs
 - ☐ Packaging
 - ☐ Requires staff training
 - ☐ Other, please specify
-

23. Would you be interested in receiving training on the MDA regulations that apply to your business?

- ☐ Yes
- ☐ No [\[Skip to 29\]](#)

☐ Additional Comment

24. Which MDA regulations or type of regulations would you be interested in receiving training in? Check all that apply.

- ☐ Good manufacturing practices
 - ☐ Thermally processed low-acid foods
 - ☐ Acidified foods
 - ☐ Fish, fishery or seafood HACCP
 - ☐ Juice HACCP
 - ☐ Other, please specify
-

25. From which providers would you be interested in receiving training? Check all that apply

- ☐ Michigan Department of Agriculture
 - ☐ Michigan State University (MSU) Extension
 - ☐ MSU Product Center
 - ☐ Michigan Food and Farming Systems (MIFFS)
 - ☐ Michigan Farmers Market Association (MIFMA)
 - ☐ Michigan Agricultural Cooperative Marketing Association (MACMA)
 - ☐ Commodity groups
 - ☐ Private for-profit training organizations
 - ☐ Other producers, processors, or businesses
 - ☐ Other online resources
 - ☐ Additional providers
-

26. What training formats would you prefer? Check all that apply.

- ☐ Printed handbook/manual
 - ☐ Download handbook/manual
 - ☐ CD / DVD
 - ☐ Posters
 - ☐ In-class (face-to-face)
 - ☐ Conference sessions
 - ☐ Online web-based training
 - ☐ Brochures
 - ☐ Printed newsletter
 - ☐ Email newsletter
 - ☐ On-farm or on-site training
 - ☐ Other, please specify
-

27. At what times of day would training sessions be most convenient? Check all that apply.

All Day

Morning

Afternoon

Evening

No preference (Check any circle)	☐	☐	☐	☐
Any month	☐	☐	☐	☐
January	☐	☐	☐	☐
February	☐	☐	☐	☐
March	☐	☐	☐	☐
April	☐	☐	☐	☐
May	☐	☐	☐	☐
June	☐	☐	☐	☐
July	☐	☐	☐	☐
August	☐	☐	☐	☐
September	☐	☐	☐	☐
October	☐	☐	☐	☐
November	☐	☐	☐	☐
December	☐	☐	☐	☐

28. What days of the week would be most convenient for training sessions? Check all that apply.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
No preference (Check any circle)	☐	☐	☐	☐	☐	☐
Any month	☐	☐	☐	☐	☐	☐
January	☐	☐	☐	☐	☐	☐
February	☐	☐	☐	☐	☐	☐
March	☐	☐	☐	☐	☐	☐
April	☐	☐	☐	☐	☐	☐
May	☐	☐	☐	☐	☐	☐
June	☐	☐	☐	☐	☐	☐

July	☐	☐	☐	☐	☐	☐
August	☐	☐	☐	☐	☐	☐
September	☐	☐	☐	☐	☐	☐
October	☐	☐	☐	☐	☐	☐
November	☐	☐	☐	☐	☐	☐
December	☐	☐	☐	☐	☐	☐

29. Do you have any other food safety concerns that you would like to share?

Thank you for your participation.

Small food processors, producers and food entrepreneurs are invited to participate in a series of discussion forums on Michigan food safety regulations. As the Michigan Food Law is improved and revised, these forums provide an opportunity for small farm operators and food entrepreneurs to provide input on food safety and how regulations affect them.

The forums are hosted by MIFFS with funding from the Michigan Department of Agriculture in order to learn more about perceptions and experiences of food safety regulations and discover if and how regulations have constrained the viability of small food businesses.

These forums will take place throughout the month of March at the following locations:

March 2, 6 - 8 p.m. at the NEW Center in Ann Arbor

March 9, 6 - 8 p.m. at the Portage District Library in Portage

March 15, 9 - 11 a.m. at the Bay County Michigan State University (MSU) Extension office in Bay City

March 25, 10 a.m. - 12 p.m. at the Mecosta County MSU Extension office in Big Rapids

March 30, 10 a.m. - 12 p.m. at the Holiday Inn in Gaylord.

Pre-registration is requested. For further details, visit www.miffs.org/foodsafetyforums.asp or contact Jenifer Buckley, Project Manager, at jbuckley@msu.edu or (517) 355-5962.



Appendix B: Discussion Forum Guide



Food Safety Regulation Discussion Forum

Maximizing engagement to minimize food safety risk: Improving training and regulatory impacts for small processors, producers, and food entrepreneurs

Discussion Questions

The Michigan Department of Agriculture would like to improve food safety regulations for small food businesses.

1. How well do you feel you understand MDA food safety regulations?
2. For those who respond that they do understand them well:
 - Can you describe what has helped you to understand the regulations well?
 - Have you received help from an inspector or other MDA personnel in understanding regulations?
3. For those who respond that they do not understand them well:
 - What about the regulations themselves is unclear? What seems inconsistent?
 - How do you find out which regulations apply to your operations?
 - What has been your experience with the inspector? Was their information unclear or inconsistent?
4. How many of you are licensed by county health departments as well as by the MDA?
 - Has this been confusing?
5. In what ways have inspectors been helpful, or unhelpful? Examples?
 - Are there topics on which you think that inspectors need more training?
6. Can you give an example of a regulation that is not clear, and suggest how it could be improved?
7. How does the timing of inspections impact your business operations?
 - How could the MDA improve inspection scheduling?
8. Are there other comments or concerns you would like to share/discuss?

Thank you for taking time to share your experiences and concerns with us. Safe travels home.