

Clover Valley Farms
Interview with Cindy Hale

Summary:

- Hale and Hall started raising poultry in 2004 and began selling their poultry from the farm in 2007.
- Clover Valley Farms was the subject of a case study completed by the Minnesota Institute for Sustainable Agriculture in 2011, which was shared widely with other experts and organizations in Minnesota.
- Clover Valley Farms was incorrectly told by an MDA staff person that outdoor processing of poultry in Minnesota was illegal
- The farm was in fact legal because Hale and Hall were processing fewer than 1000 birds per year and selling to individuals who came directly to the farm to pick up the birds
- After this incident, Hale and Hall made an economic decision to move away from poultry and into vinegar and other value-added production.
- This decision stemmed from the fact that they could not get insurance for their farm. Many insurers do not know how to assess risk for innovative farming models and are thus reluctant to grant coverage.

Cindy Hale and Jeff Hall run Clover Valley Farms in Northeastern Minnesota as a modern homesteading model that makes economic use of every feature of their farm. Integrated farming is key to their practice, and features of their integrated system include apple and small fruit orchards; pastured sheep, hogs, and chickens; a year round passive solar greenhouse; and more. Poultry production was added into the farm management system in 2004.

As time passed after this addition in 2004, Hale and Hall wanted to raise poultry as a yearly project that could fit with their off-farm jobs - jobs which revolved around the academic-year calendar. As a result, the Hale and Hall focused on growing their flock. During this growing process, they referred extensively to resources from the Minnesota Department of Agriculture (MDA) and connected with University of Minnesota Extension Educator, Wayne Martin - a specialist in small scale poultry production and other small scale livestock production. Hale and Hall began selling poultry from the farm in 2007, and specific details on their business planning methods can be found at: http://sustagprofiles.info/cvf_intro.html

Because their integrated farming system was of high interest to other producers statewide and beyond, Clover Valley Farms allowed the [Minnesota Institute for Sustainable Agriculture \(MISA\)](#) to write an in-depth case study of their farm operations in 2011. As this case study neared completion, it was shared with many state and local experts within organizations like University of Minnesota Extension and the MDA. MISA staff were intentional in bringing in this expertise so that the report could accurately depict inspection and regulation requirements.

Trouble arose for MISA staff and Clover Valley Farm when a report draft was returned from MDA with a post-it note next to the poultry processing picture, stating that outdoor processing

was not legal. As business owners trying to create a successful enterprise who had conducted extensive research during the planning phase, it was unnerving and traumatic for Hale and Hall to be unexpectedly told that their operation was illegal. MISA staff and a few reviewers from other organizations conducted follow-up discussions with MDA staff to determine the statute and rulemaking behind this statement. In the end, it was determined that the assessment made in that note was a misinterpretation of current rules and statute. Outdoor processing was allowed in the case of Clover Valley Farms because of factors like the processing of <1,000 birds per year and Hale/Hall were selling to individuals who came directly to the farm to pick up their birds. As a result of this experience, MISA worked with MDA staff over the next few months to develop information about poultry processing regulations that was included in the [Clover Valley Farms case study](#). Around the same time, the MDA also updated a [fact sheet](#) that more clearly explained poultry sales and regulations for farmers.

The assessment that poultry processing was occurring illegally stopped the Clover Valley Farms poultry operation in its tracks until resolution could occur. Although all parties involved worked to get to the bottom of the issue as quickly as possible, Hale and Hall were unaware if any formal system for re-evaluation of an inspector's or other staff person's statement existed. Resolution of the Clover Valley Farms issue and clarification of the larger body of regulations surrounding farmer sales of poultry happened, in this case, because of the context of an organization (MISA) developing a publication that required accurate regulatory information. As Cindy Hale stated, "We (as farmers) really have to rely on the inspector or MDA staff, and if you get one who makes an offhand comment that is incorrect, the business owner doesn't have the resources and knowledge to question the inspector." Hale feels there is a strong need to clarify the appeal process.

Even though resolution was reached that allowed them to continue outdoor processing and on-farm poultry sales, Clover Valley Farms eventually decided to move away from the poultry business and into vinegar and other value-added production for economic reasons. Hale states, "While regulation turned out not to be the primary factor related to our decision to stop egg production, downsize meat production and ultimately get out of the on-farm poultry processing, it continued to lurk in the backs of our minds." As it turned out, a larger issue that arose was around purchasing insurance. Because Hale and Hall have a mortgage on their farm, they must have insurance, but Hale has realized that many insurers do not know how to assess risk for innovative farming models and are thus unwilling to grant coverage. The regulations allowing on-farm processing and sale of poultry seemed ambiguous to insurers they contacted even after Hale and Hall provided extensive documentation of the registration process, legal requirements, labeling requirement, and more that made them compliant with federal and state regulations.

A positive result of the on-farm processing conversations has been that regulations around on-farm poultry processing are now more familiar to MDA inspection staff. Additionally, more information about on-farm processing has been included in new inspector training. One factor Hale would like to see improved is the clarity and availability of resources for farmers from the MDA. During the conversations on outdoor poultry processing, it came to light that Clover Valley

Farms also needed to be registered as an on-farm exempt poultry producer - a fact Hale and Hall had not run across in what they had perceived to be an extensive search of the MDA resources. They discovered this document was listed under an egg production section of the resources - a place they had not looked as they were not selling eggs direct-to-customer, only meat. Hale still finds information difficult to locate on the MDA website. In a recent search for this form, as this case study interview was being conducted, Hale managed to find a link for the form after some searching, but it led her to a broken page. Hale pointed out that she also knows to look for this link now, but it can be a lose-lose situation for farmers and food entrepreneurs if they are expected to complete documentation but can't find information on that expectation easily on the MDA website.

An additional factor Hale feels might have improved the Clover Valley Farms experience is for the regulatory system to have a clearer appeal method. She'd like it if more farmers and food entrepreneurs knew where they could make rapid appeals for second opinions on inspection mandates - especially those that would completely halt production. Furthermore, Hale states, "...while an appeals process would be good, this only becomes necessary if and when a problem arises. Even better, would be better access to complete and easy to understand information related to various regulatory requirements before an issue arises. Most farmers want to comply with laws and regulations, but if they can't easily find them or interpret them this leads to problems...and then you need an appeals process."