Blazing Trails through the Jungle of Local Food Regulations

A project of Minnesota Institute for Sustainable Agriculture, Renewing the Countryside, and Minnesota Farmers’ Market Association

Funded by:
North Central Sustainable Agriculture Research & Education Program (NCR-SARE)
Who We Are

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Who Is Helping Us

Local Food Advisory Committee

Minnesota Department of Health
- Food, Pools, and Lodging Section
- Statewide Health Improvement Partnership

Minnesota Department of Agriculture
- Food and Feed Safety Division
- Dairy and Meat Inspection Division
Why This Project?

• All three of us have worked with local food systems in Minnesota for many years, and have witnessed and experienced confusion about regulations.

• We have seen good ideas struggle and sometimes fail because of confusion and misinformation about regulations.

• Knowledge is power! We have knowledge to share.
Why Now?

• We have funding from the Sustainable Agriculture Research & Education Program of USDA

• We have a collection of useful materials created over the past 5 years with assistance from the MN Department of Agriculture and MN Department of Health

• Local food is in demand, innovative food business models are multiplying, and understanding of regulations needs to catch up.
What We Will Do:

• Train farm educators, food system advocates and educators, and leaders in the agriculture and food communities on the basics of regulation of local food enterprises and systems

• Provide reference materials and a PPT presentation to trainees so they can become resource people in their communities
  - Printed binder + flash drive containing key reference materials
Regarding the COVID-19 Crisis:

• This presentation trains to the law as it stands.

• During the COVID-19 crisis, MDA is exercising enforcement discretion around some activities that help reduce physical contact between people.

• Enforcement discretion is limited, and won’t last forever. Food businesses need to be prepared to follow the laws that exist.
What Topics Will We Cover?

- The landscape of food regulation: federal, state, local (statute & rule)
- Exclusions and exemptions from licensing
- Jurisdiction among regulatory agencies for licensing and inspection
- License types issued by MDA
- License types issued by MDH
- Delegation authorities
- Food Innovation Team
What this IS:

Information about how to navigate the regulations that exist and how to find help if you’re stuck

What this is NOT:

Advocacy to change laws, complain about the laws, or figure out how to circumvent the laws
What this IS:

Information to increase your awareness and understanding of how and when to ask questions

What this is NOT:

You won’t know everything about the details of the law at the end of this training.
Where and When?

All 87 counties in Minnesota

Tribal Nations

January 2019 through August 2020
Reference Materials
Reference Materials

Tier 1 & Tier 2 are what we will cover

Center for Integrated Agricultural Systems, University of Wisconsin. 2010.
Reference Materials For Farmers:

SELLING MINNESOTA
AGGREGATION
OF FARMERS’ PRODUCE

This fact sheet is for Minnesota farmers who want to sell produce they raise. The fact sheet covers regulations for ways for farmers to sell their produce to individual consumers or to food facilities in Minnesota.

Definitions
Aggregation: An aggregation is an individual or business entity that collects and distributes produce from multiple sources. This example of aggregation of farmers’ produce: a farmer’s market, food bank, a club, a company, a school, etc. who does the product marketing for several other farmers.

Approved Source
You may use an approved source for produce that is grown by a farmer who is a small family farm or a small local farmer. Approved sources include: Minnesota State University, College of Agriculture, Food, and Environment; University of Minnesota Extension; Minnesota Department of Agriculture; or other approved sources.

SELLING MINNESOTA
POULTRY PRODUCTS

This fact sheet is for Minnesota farmers who want to sell poultry they raise on their own farm. The fact sheet covers regulations for all of the ways for farmers to sell their poultry to individual consumers or to food facilities in Minnesota.

Definitions
Poultry: “Poultry” means chickens, turkeys, ducks, geese, pheasants, quail, and their products.

Approved Source
You may use an approved source for poultry that is grown by a farmer who is a small family farm or a small local farmer. Approved sources include: Minnesota State University, College of Agriculture, Food, and Environment; University of Minnesota Extension; Minnesota Department of Agriculture; or other approved sources.

SELLING MINNESOTA
MEAT PRODUCTS

This fact sheet is for Minnesota farmers who want to sell meat they raise on their own farm. The fact sheet covers regulations for all of the ways for farmers to sell their meat to individual consumers or to food facilities in Minnesota.

Definitions
Meat: “Meat” means beef, pork, lamb, goats, or other animal flesh.

Approved Source
You may use an approved source for meat that is grown by a farmer who is a small family farm or a small local farmer. Approved sources include: Minnesota State University, College of Agriculture, Food, and Environment; University of Minnesota Extension; Minnesota Department of Agriculture; or other approved sources.

SELLING MINNESOTA
SHELL EGGS

This fact sheet is for Minnesota farmers, small flock owners, and local food entrepreneurs who want to sell eggs. The fact sheet covers regulations for sales of eggs from your own flock of any size, as well as for sales of distribution of eggs collected from other flocks than your own.

Definitions
Eggs: Eggs from species defined as “poultry” in Minnesota. “Poultry” means domesticated fowl, including chickens, turkeys, and game birds, as well as other species of birds, which are bred for the primary purpose of producing eggs.

Approved Source
You may use an approved source for eggs that are grown by a farmer who is a small family farm or a small local farmer. Approved sources include: Minnesota State University, College of Agriculture, Food, and Environment; University of Minnesota Extension; Minnesota Department of Agriculture; or other approved sources.

APPROVED WATER SUPPLY
For Rural Food Businesses

This fact sheet is for Minnesota rural and on-farm food businesses. All water used in food service or food manufacturing must come from an approved source.

Minnesota laws on water-source:

- Minnesota Rules 520.0950
- Minnesota Rules 520.0951
- Minnesota Rules 520.0952
- Minnesota Rules 520.0953
- Minnesota Rules 4700
- Minnesota Rules 4701
- Minnesota Rules 4702

Public water supply:

If your farm or rural business is not connected to a public water supply, you can use the following guidelines to determine if your premises is connected to a private well or a public source of water. If the well is not approved, you may use the Code of RCFB in order to use an approved spring. If you are unsure if your water source is approved, contact the state health department.

Onsite Inspection

Your location’s private well.

If your farm or rural business is not connected to a public water supply, you can use the following guidelines to determine if your premises is connected to a private well or a public source of water. If the well is not approved, you may use the Code of RCFB in order to use an approved spring. If you are unsure if your water source is approved, contact the state health department.

http://www.misa.umn.edu/publications
Reference Materials For Buyers:

- Approved Sources of Meat and Poultry for Food Facilities
- Sale of Locally Raised Eggs to Food Facilities
- Selling or Serving Locally Grown Produce in Food Facilities
Reference Materials: Foraging
Reference Materials:
Cottage Food
Reference Materials: Other Products

WHAT IS RAW MILK

PET FOOD PROGRAM

https://www.mda.state.mn.us/food-feed/what-raw-milk

https://www.mda.state.mn.us/food-feed/pet-food-program
Reference Materials: FSMA Produce Safety Rule
Reference Materials: Food & Beverage Service

Seasonal Temporary Food Stand
Food, Pools, and Lodging Services (FPLS)

Special Event Food Stand
Food, Pools, and Lodging Services (FPLS)

Seasonal Permanent Food Stands Plan
Food, Pools, and Lodging Services (FPLS)

Mobile Food Unit
Food, Pools, and Lodging Services (FPLS)
Reference Materials:
Food & Beverage Service

http://www.misa.umn.edu/publications
For food processors

Becoming a licensed food processor – acidified foods

There are several steps to becoming licensed to start your acidified food processing business. Different people and organizations are involved in different steps.

https://extension.umn.edu/food-safety/food-processors
Reference Materials: For Food Businesses

Starting a Food Business Roadmap

START HERE

Driver’s Ed: Learn the Basics
- Establish a support system.
- Research the basics of financing and resources available to you.
- Consider other aspects of commercialization.

Business Planning Parking Lot
- Complete a need analysis.
- Conduct market research to define your target market.
- What is your price point?
- What makes your product unique?

Funding and Financing
- Meet with your banker to discuss financing.
- Research other grant and loan opportunities.

Food safety Regulations and Information
- Learn about food safety regulations, limitations, and resources tailored to your business.
- Understand food safety and quality management (SCC, sanitation, etc.).
- Create a food safety plan and retail plan.

Plan for Production
- Find sources and how you will source ingredients, equipment, and other supplies.
- Decide where you will produce your products.
- Think about where you will sell your products.

Food Licensing Round-About
- Minnesota Department of Health
- Minnesota Department of Labor and Industry
- Federal

Additional Resources
- Identify other resources to help you start your food business.

Scanning the Horizon
- Meet with your.js
- Talk to your business and food safety experts regularly.
- Decide how you will reach your customers.

DRAFT 6.18

Note: What licensing you will need can be a confusing process. Depending on your food business, you may require a local or state business license, from MnH, MnOL, or one or more local and state regulatory agencies. Also, food products that are (sp) or are made on site (for instance, food trucks, cafes, etc.) required a license from MnH.
- Some types of food businesses may require licensing or permits from federal agencies or local regulatory agencies.
Office Information

The Revisor's Office is a nonpartisan office of the Minnesota Legislature. The office provides confidential drafting services of legislative and administrative documents. Since its founding in 1939, the office has served as the compiler of Minnesota Statutes and is the official publisher of Minnesota Statutes, Laws, and Rules.

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@MNRevisor
The Office of the Revisor of Statutes is currently have an opening for an attorney with 10 years of experience. For details, please visit revisor.mn.gov/employment/#mnleg

Revvisor of Statutes
@MNRevisor
Minnesota Statutes 2018 have been published.
The landscape of food regulation: federal, tribal, state, local (statute & rule)
Landscape of Food Regulation

Food:

"Food" means every ingredient used for, entering into the consumption of, or used or intended for use in the preparation of food, drink, confectionery, or condiment for humans or other animals, whether simple, mixed, or compound; and articles used as components of these ingredients.

M.S. 34A.01 Subdivision 4
https://www.revisor.mn.gov/statutes/cite/34A.01
Sell/Sale:

"Sell" and "sale" mean keeping, offering, or exposing for sale, use, transporting, transferring, negotiating, soliciting, or exchanging food; having in possession with intent to sell, use, transport, negotiate, solicit, or exchange food; storing, manufacturing, producing, processing, packing, and holding of food for sale; dispensing or giving food; or supplying or applying food in the conduct of any food operation or carrying food in aid of traffic in food whether done or permitted in person or through others.

M.S. 34A.01 Subdivision 12
https://www.revisor.mn.gov/statutes/cite/34A.01
Landscape of Food Regulation

Definitions:

**Food** = Every ingredient involved in something humans will eat or drink

**Sell/Sale** = Any time food changes hands in any way
Landscape of Food Regulation

Definitions:

Person = Any individual, firm, partnership, cooperative, society, joint stock association, association, company, or corporation and includes any officer, employee, agent, trustee, receiver, assignee, or other similar business entity or representative of one of those entities.

Individual = An actual flesh-and-blood human being

M.S. 34A.01 Subd. 10
https://www.revisor.mn.gov/statutes/cite/34A.01
Landscape of Food Regulation

Phrases not defined in Minnesota statute:

“Regularly Engaged in Food Business”

“Community Event”

“Point of Sale”

*** If you run into unknowns, there is help! We’ll talk about the Food Innovation Team in a bit.
Landscape of Food Regulation

Abbreviations:

CFR = Code of Federal Regulations

CGMP = Current Good Manufacturing Practices

PMO = Pasteurized Milk Ordinance
Landscape of Food Regulation

More Terms:

Approved = MN Rules 4626.0020 subpart 4

Exemption = given in statute

Exclusion = carved out of statute
Landscape of Food Regulation

Federal Law:

USDA

Pure Food and Drug Act (1906)

Meat Inspection Act (1906)

Poultry Products Inspection Act (1957)
Landscape of Food Regulation

Federal Law: FDA

Pasteurized Milk Ordinance (1924)

Food, Drug, and Cosmetic Act (1938)

Food Safety Modernization Act (2011)
Landscape of Food Regulation

Food Safety Modernization Act (2011)  
7 parts:

* Produce Safety  
* Preventive Controls for Human Food  
* Preventive Controls for Animal Food  
* Sanitary Transportation of Food  
* Foreign Supplier Verification  
* Accredited Third-Party Certification  
* Intentional Adulteration of Food
“Where are you going, my pretty maid?”
I’m going a-milking, sir,” she said.
“Dear maiden, I’d like to disclose the fact,
That I’m an inspector under the Act.
So pray remain, for I want to know
A thing or two before you go.
Nay, pretty maiden, you must not weep;
How far away are the pigs you keep?
And what percentage of butter-fat
Does your moo-cow yield? Pray tell me that.
And how is the health of your pretty pet;
Has it anthrax, cancer, blackleg, garget?
Has your sister measles or whooping cough;
Is the water clean in the drinking trough?
I pray thee answer these questions of fact,
For I’m an inspector under the Act.
With the fierce bacilli also I cope
By means of my powerful microscope.
Excuse me, I must examine your hand,
Purely official, you understand.”

--accessed from Living History Farms website
Landscape of Food Regulation

Federal Law:

USDA:
meat, poultry, eggs

• MN can be stricter than, but not less strict than USDA

Stricter in MN:
• “Amenable” farm-raised game species
• Fewer types of exemptions for on-farm poultry processing
Landscape of Food Regulation

Federal Law:

FDA:

fish, shellfish, snails, crickets, milk, all other food...

...unless a wholesale food product contains more than 2% meat. Then it’s USDA.
Landscape of Food Regulation

State Statute
- no variances

State Rule
- variances allowed

Minnesota Rule 4626:
Minnesota Food Code

Crossing State Lines? FDA or USDA
Landscape of Food Regulation

Sovereign Nations

In general (may be exceptions):

- Trust Land: Activities subject to tribal law
- Fee Land & Privately Owned: Activities subject to federal, state, and local laws
- Gray area: When a food product is made on trust land but sold elsewhere
Landscape of Food Regulation

**Sovereign Nations**

Model Ag & Food Code:

[https://www.tribalfoodcode.com/](https://www.tribalfoodcode.com/)
Landscape of Food Regulation

Local Ordinances
- variances
- conditional use permits
- zoning

Best Practices
- GAP
License vs. Inspection

Legal authority of MDA to inspect: M.S. 31.04

Legal authority of MDA to enforce: M.S. 34A.04

Legal authority of MDH to inspect and enforce: M.S. 157.20

Inspection authority flows to delegated authority if specified in the contract for the delegated authority
M.S. 31.04 For purposes of enforcement of the Minnesota Food Law, the commissioner, or any of the commissioner's authorized agents, is authorized upon presenting appropriate credentials to the owner, operator or agent in charge:

(1) to enter at reasonable times any factory, warehouse, or establishment in which food is manufactured, processed, packed or held for introduction into commerce or after such introduction or to enter any vehicle being used to transport or hold such food in commerce;

(2) to inspect at reasonable times and within reasonable limits and in a reasonable manner such factory, warehouse, establishment or vehicle and all pertinent equipment, finished and unfinished materials, containers and labeling therein; and to obtain samples necessary to the enforcement of the Minnesota Food Law; and

(3) to have access to and to copy all records of carriers in commerce showing the movement in commerce of any food or the holding thereof during or after such movement, and the quantity, shipper and consignee thereof; provided, that evidence obtained under this clause shall not be used in a criminal prosecution of the person from whom obtained; and provided, further, that carriers shall not be subject to the other provisions of the Minnesota Food Law by reason of their receipt, carriage, holding, or delivery of food in the usual course of business as carriers.
M.S. 34A.04 Subdivision 1. Enforcement required.

(a) The commissioner shall enforce this chapter and chapters 28, 28A, 29, 30, 31, 31A, and 34. To carry out the enforcement duties under these chapters, the commissioner may, upon presenting appropriate credentials, during regular working hours and at other reasonable times, inspect premises subject to the commissioner's enforcement and licensing authority; require information from persons with information relevant to an inspection; and inspect and copy relevant papers and records, including business records.
Subdivision 1. Inspections.
It shall be the duty of the commissioner to inspect, or cause to be inspected, every public pool, food and beverage service establishment, hotel, motel, lodging establishment, or resort. For the purpose of conducting inspections, the commissioner shall have the right to enter and have access thereto at any time during the conduct of business.

Subdivision 3. Orders.
When, upon inspection, it is found that the business and property so inspected is not being conducted, or is not equipped, in the manner required by the provisions of this chapter or the rules of the commissioner, or is being conducted in violation of any of the laws of this state pertaining to the business, it is the duty of the commissioner to notify the person in charge of the business, or the owner or agent of the buildings so occupied, of the condition found and issue an order for correction of the violations. Each person shall comply with the provisions of this chapter or the rules of the commissioner. A reasonable time may be granted by the commissioner for compliance with the provisions of this chapter.
Landscape of Food Regulation

Keeping our presentation on track:

Some things are relevant to Local Food Businesses

But we’re not going to talk about them
Landscape of Food Regulation

Taxes?

Visit MN Dept of Revenue Website to find fact sheets

www.taxes.state.mn.us

Fact Sheet # 148: Selling Event

www.revenue.state.mn.us/businesses/sut/factsheets/FS148.pdf
Landscape of Food Regulation

Taxes?

Fact Sheet #102D
Industry Guide: Prepared Food

www.revenue.state.mn.us/businesses/sut/factsheets/FS102D.pdf
Landscape of Food Regulation

Insurance? Business Structure?

Find info for farm-based enterprises:

Secretary of State
Farm Commons
FLAG
Ag Law Ctr @ Drake University
Public Health Law Center/Mitchell-Hamline
Great Lakes Indigenous Law Center
Quiz:

- When were the first federal food laws enacted?

- What’s the most recent federal food law?

- What was the main original reason for pasteurizing milk?

- What is food?

- What food exchanges are not considered a “sale?”
Does Safe = Licensed?

Does Licensed = Safe?

Not always!

Locally-grown product of the farm is an approved source of food without being licensed.
Exclusions from Licensing
Exclusion from Licensing

Product of the Farm

State of Minnesota Constitution, Article 13, Section 7

MN Statute 28A.15 Subd. 2:
https://www.revisor.mn.gov/statutes/cite/28A.15
Product of the Farm

Product of the farm is NOT an exclusion from food safety requirements!

- Follow CGMPs
- Adequate facility
  * Not a private residence
  * Not used for personal activities
Product of the Farm

People can sell their own product of the farm or garden to any buyer, including food facilities, with no license.

- Has to be from their owned or rented property (any size or configuration)

- No off-farm ingredients added

Cultivated mushrooms grown in a growth chamber in seller’s basement = product of the farm.

Herbs grown in a 6’ x 6’ raised bed in seller’s backyard = product of the farm.
Product of the Farm

- Meats with no added ingredients
- Poultry products with no added ingredients
- Shell eggs
- Fruits
- Vegetables
- Edible flowers
- Cultivated Mushrooms
- Herbs
- Nuts
- Grains
- Dry beans
- Honey
- Maple syrup
- Wild foraged foods from own property

What’s missing from this list? DAIRY. Dairy products have additional facilities and inspection requirements under the Pasteurized Milk Ordinance (PMO)
Product of the Farm

- Meats with no added ingredients
- Poultry products with no added ingredients
- Shell eggs

Why are these items blue?

Because regulations for sale of these items depend on your buyer and on where you sell.
Product of the Farm

- Meats with no added ingredients
- Poultry products with no added ingredients
- Shell eggs

If you are selling to a food business:

- the meat or poultry must be processed under inspection (USDA or Minnesota Equal-To)
- shell eggs have grading, candling, & labeling requirements.
Locally raised meats and poultry are legal for food facilities to use if slaughtered and processed under continuous (daily) inspection. Two options:

- USDA (can cross state lines)
- Minnesota Equal-To (can be sold within MN)

http://misadocuments.info/LFAC_local_meat.pdf

http://misadocuments.info/LFAC_local_poultry.pdf
If you buy an animal out of the sales ring at a livestock auction … and take it straight to a butcher for your meat sales … is that really product of your farm?
Livestock dealers are required to have a license to buy & sell animals. The dealer license is not required for:

“...persons engaged in the business of farming, when purchasing livestock for breeding or herd replacement purposes or feeding programs, and when selling the livestock they have owned and raised, fed out or fattened for slaughter in their specific farming program.”

M.S. 17.03 Subdivision 7(b)
Product of the Farm

Meat & Poultry

USDA inspection “bugs”

Minnesota Equal-To Inspection “bug”
Product of the Farm
Meat & Poultry

“Non-amenable” species:

- bison
- cervidae (elk, deer)
- rabbit
- guinea pig
- pheasant
Kosher or Halal Processing

- Religious bodies must approve the slaughterer to conduct slaughter according to their requirements.
- The slaughterer must submit an application to MDA or USDA that includes a certificate of approval from their religious body.
- The slaughterer must pass a visual inspection of their slaughter technique on the kill floor of a processing plant. They must be able to accomplish humane slaughter with their technique.
Wild-harvested game cannot be sold in commerce because it doesn’t get a pre-slaughter inspection.*

*May be exceptions in some tribal settings.
Farm-raised dangerous animals (elk, bison, bull) can have antemortem inspection on-farm. The inspector witnesses the whole process of killing and transport to the plant. Animal carcass must be left intact & delivered to plant within a limited period of time (1 hr).
Donated meat has to be eligible to be sold to a food facility;

UNLESS it’s the Venison Donation Program

• Venison donation program – set up through DNR with cooperation from MDA specifically for donation to nonprofit food assistance programs

M.S. 17.035 venison donation
Product of the Farm

Meat & Poultry

OR donation of traditional Native American foods to a food service program in a public facility

- Wild-harvested wild game or fish can be donated to food service programs that serve primarily (more than 50%) Native Americans.

- It is the food service’s responsibility to verify the donated game is wholesome and was handled in a sanitary manner.
Product of the Farm

Meat & Poultry

OR donation of wild-harvested wild game to a registered charitable organization.

• The donor of the game must provide a receipt documenting the gift of the game to the receiving organization.

• The game meat must be received and processed in an MDA-licensed facility; and handled, stored, prepared, and served according to all sanitary requirements in licensed facilities.
Locally raised shell eggs are legal for food facilities to use. Eggs are product of the farm if sold by the farmer who owns the egg-layer flock, and can be handled and sold by others with the proper licensing from MDA and/or registration from USDA.

http://misadocuments.info/LFAC_local_eggs.pdf
Product of the Farm
Shell Eggs

Health care facilities may be an exception. Pasteurized eggs are required for some uses at health care facilities because their patients or residents are defined as “highly susceptible populations.”

http://misadocuments.info/LFAC_local_eggs.pdf
Product of the Farm

Shell Eggs

Small Flock Egg Producer Registration Form

http://mda.state.mn.us/sites/default/files/2018-05/ag02433eggx_0.pdf
Questions about meat, poultry, or shell egg sales to food facilities?
Product of the Farm

- Meats with no added ingredients
- Poultry products with no added ingredients
- Shell eggs

If you are selling to individuals at a farmers’ market:
- The meat *must* be processed under inspection
- The poultry can be processed under inspection OR on the farm in an approved facility, and labeled as PL-exempt.
- Shell eggs have grading, candling, & labeling requirements.
Farmers can process chicken on their own farms, without a license, under approved sanitary conditions, for sale to individual end consumers.

Whole Chicken
Exempt PL 90-492
Smith Poultry
1234 Pasture Road
Anytown, MN 5555

<table>
<thead>
<tr>
<th>Safe Handling Instructions</th>
</tr>
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<tbody>
<tr>
<td>Some food products may contain bacteria that could cause illness if the product is mishandled or cooked improperly. For your protection, follow these safe handling instructions:</td>
</tr>
<tr>
<td>Keep refrigerated or frozen. Thaw in refrigerator or microwave.</td>
</tr>
<tr>
<td>Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.</td>
</tr>
<tr>
<td>Cook thoroughly.</td>
</tr>
<tr>
<td>Keep hot foods hot. Refrigerate leftovers immediately or discard.</td>
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Product of the Farm

Storage & Transport Requirements for meat, poultry, and eggs at farmers’ markets:

Meat & Poultry – frozen, 0°F
   -- fresh, 41°F + date-marking

Shell Eggs – 45°F
Product of the Farm

Questions about meat, poultry, or shell egg sales at farmers’ markets?
Product of the Farm

- Meats with no added ingredients
- Poultry products with no added ingredients
- Shell eggs

If you are selling to an individual customer who comes to your farm:

- Meat packages must have been processed under continuous inspection
- Poultry can be inspected, or processed on the farm
- Eggs need not be candled, graded, or labeled
Product of the Farm

Custom-Exempt Sales

Meat or poultry, sold prior to slaughter and processed at a licensed & permitted Custom-Exempt facility

- The customer gives their cutting & processing instructions to the custom-exempt facility.
- The customer can choose to have ingredients added such as spices, and special processes such as smoking.
Product of the Farm

Custom-Exempt Sales

Packages go to the customer and are labeled “Not for Sale” or unlabeled.
Product of the Farm

Wild foraged foods

* **Wild Mushrooms** can qualify as product of the farm if harvested on the seller’s owned or rented property, BUT the seller must have their certificate of training in wild mushroom identification and be registered with the MN Department of Agriculture.

* **Herbs, edible flowers, nuts, other edible plants or portions of plants** can qualify as product of the farm if harvested on the seller’s owned or rented property.
Product of the Farm

Wild foraged foods

If you’re harvesting wild foods on land you don’t own or rent, you need a food handler license for the sale of those products.

If public land or public waters, Natural Resources agency permit may be required (state or tribal)
Processed Product of the Farm?
Product of the Farm

Can include processed fruits & vegetables

2 triggers end product of the farm status & require a license:

1. Sold by someone other than the farmer who grew it.
2. Added off-farm ingredients.

Processing is NOT a trigger to require a license (but maybe an inspection, commercial-grade facility, food safety plan, and other requirements)

http://misadocuments.info/LFAC_local_produce.pdf
Making vegetables presentable for sale is not “Processing”

Farmers and gardeners can always do these tasks, using potable water, meaning water that is safe to drink.

- Trim roots
- Trim tops
- Wash off soil
- Remove outer husks or leaves
Product of the Farm

What is “processing” of fruits, vegetables, mushrooms, or herbs?

Peeling
Shredding
Dehydrating
Bagging*
Canning*
Fermenting*

Slicing
Wrapping
Freezing
Waxing
Treatment for ripening

*These may be special processes that require additional training, certification, facilities, etc.

http://misadocuments.info/LFAC_local_produce.pdf
Product of the Farm

Farmers can do this, with potable water, appropriate facilities (not a kitchen in a private residence), and appropriate processes. Follow CGMPs.

Examples:

- Shredded, bagged cabbage
- Peeled, sliced carrots
- Chunks of squash
- Frozen blueberries
- Frozen apple slices

http://misadocuments.info/LFAC_local_produce.pdf
Questions about fruit & vegetable processing under the Product of the Farm Exclusion?
Product of the Farm

Fermented product:
  Kombucha
  Vinegar

If your kombucha has too much alcohol, it comes under DPS and taxation. You have to really control your process.

Alcohol is regulated by Department of Public Safety. www.dps.state.mn.us

See fact sheet – DPS - AGTE
Product of the Farm

Alcohol:
  Mead
  Wine
  Beer
  Spirits

Alcohol is regulated by Department of Public Safety. [www.dps.state.mn.us](http://www.dps.state.mn.us)

Seek out fact sheets.

Federal Tax & Trade Bureau (TTB)
Product of the Farm

Beverages:
Kombucha
Herbal infusion or Tea
Fruit juice*
Vegetable juice*
Fruit/Vegetable juice blends*
Wheatgrass juice

http://misadocuments.info/LFAC_local_produce.pdf

* These may require special processes: pasteurization, juice HACCP (Hazard Analysis and Critical Control Processes)
Product of the Farm

Mixed-Ingredient Products:

Yes, this can be product of the farm so long as EVERY ingredient is produced by you on your farm or garden.

What if you can’t produce every ingredient yourself?

Get a license!
Product of the Farm

Sometimes you might be better off to use the Cottage Food Exemption, or to use an off-farm ingredient and get a license.
Product of the Farm

You are responsible for the safety of your product that enters commerce.

Even if other people mishandle the product after it leaves you, you may be held liable for injuries that may occur.

(Moral of the story: buy insurance)
Product of the Farm

Traceability requirements don’t apply to every enterprise.

Traceability is a best practice regardless of requirement, and can help you manage risk
Any more questions about Product of the Farm?
Exclusion from license:
Not Regularly Engaged in Food Business

M.S. 28A.15 Subd 2

* Occasional cakes
Exclusion from license:
Not Regularly Engaged in Food Business

M.S. 28A.15 Subd 2

* Organization’s Bake Sale
Exclusion from license:

Principal Mode of Business
28A.15 Subd 7

(Read entire section; be careful of “principal mode of business” and location of comma between clauses. Two separate groups of “persons” are described in the statute.)
Exemption from licensing:

Food Sampling & Demonstration

M.S. 28A. 151
At a farmers’ market or community event, you can give samples or do a cooking demonstration with samples, with no license.
Except during the COVID-19 Crisis:

- On-site food consumption is forbidden at farmers’ markets.

- This includes food sampling. No sampling allowed at least until the closure order for restaurants is lifted.
Follow requirements in MN Rule 4626.1855

(Except you do not need to have hot, pressurized water for ware-washing)

(But you do need warm water for handwashing)
Exemption from licensing:

Cottage Food

M.S. 28A.152
Cottage Food: Per Individual

• Registration with MDA is required!
  • Training is required, online or in-person
  • Training is good for three years

Tier 1:

• Up to $5,000 in annual gross sales
• No registration fee

Tier 2:

• Up to $18,000 in annual gross sales
• $50 annual registration fee

https://www.misa.umn.edu/resources/local-food-sales-resources/cottage-food
Cottage Food vs. Licensed Local Food Sales

- Can make it in a home kitchen
- Non-potentially hazardous food
- $18,000 sales cap per individual per year
- ALL sales to individual consumers
- NO sales to businesses or other food facilities
- Product delivery must be in person

- Must make it in an approved commercial-grade kitchen, not a private residence kitchen
- Any food product type is possible with appropriate facilities & training
- No sales cap
- Can sell to food businesses or food facilities
- Product delivery need not be in person
Cottage Food

Examples:
- Bakery products
- Flavored honey or maple syrup products
- Pickles, salsa, fermented products
- Jam, jelly, fruit syrup

The MN Farmers’ Market Association has a long list of allowed Cottage Food items:

https://www.mfma.org/CFL

These product types can be made and sold to INDIVIDUALS under the Cottage Food exemption …

BUT …
If you want to sell items to a food business or food facility, you can’t do that under Cottage Food. Items must be made under a license in an approved facility.
Cottage Food can be a stepping stone to licensed food production
Cottage Food During COVID-19 Crisis:

• If you are doing porch pick-up, please protect those packages from the elements.

• Arranging pick-up at your location with physical distancing is allowed.

• Delivery directly to your customers with physical distancing is allowed.
Cottage Food During COVID-19 Crisis:

• **Still not allowed**: cottage food delivery through the mail or any other delivery service –

including FedEx, UPS, meal delivery services like DoorDash; or delivery through a farmers’ market, farmer group, or other business entity.
Questions about Cottage Food?
Legal Local Food

Don’t mix exclusions and exemptions!

You must meet all conditions of the exclusion or exemption in order to claim it.
Legal Local Food

Don’t mix exclusions and exemptions!

EXCEPT: The exemption for sampling & demonstration can be combined with either Cottage Food or Product of the Farm.
Licensed Local Food Sales

Individual farmers or others can get licensed by the Minnesota Department of Agriculture to sell:

- Foods they didn’t grow themselves on their owned or rented land
- Foods with off-farm ingredients added
Licensed Local Food –
But what if food is donated?

"Sell" and "sale" mean keeping, offering, or exposing for sale, use, transporting, transferring, negotiating, soliciting, or exchanging food; having in possession with intent to sell, use, transport, negotiate, solicit, or exchange food; storing, manufacturing, producing, processing, packing, and holding of food for sale; dispensing or giving food; or supplying or applying food in the conduct of any food operation or carrying food in aid of traffic in food whether done or permitted in person or through others.

M.S. 34A.01 Subdivision 12
https://www.revisor.mn.gov/statutes/cite/34A.01
Licensed Local Food –
But what if food is donated?

Cottage Food can be donated to a fundraiser bake sale.

Venison can be donated to a food bank/food shelf/feeding program through the Venison Donation Program

Traditional Native American foods, including wild game, can be donated to a public facility

Wild game can be donated to a registered charitable organization (facility and processing requirements)
Licensed Local Food –
But what if food is donated?

Other than these specific examples, food that is donated must be eligible to be sold. It must be approved source.

Not Approved Source:

Cottage Food
Custom-Exempt Meat & Poultry
Shell eggs not candled/graded/labeled
Wild-harvested wild game
Licensed Local Food – products sold by others than the farmer who grew it:

- **Community Supported Agriculture** in which one farm buys from other, separate farms to fill their CSA box for customers
- **Farmers’ Market Aggregation** (Products from multiple vendors are collected and sold by the farmers’ market entity)
- **Food hub sales** (Products from farmers are collected and sold by a public or private entity with a goal of providing a market channel for local farmers and food makers)
- **Broker/distributor sales** (Businesses that purchase and resell or arrange for sale of large volumes of product)
Aggregation of Products During COVID-19 Crisis

“The MDA plans to exercise licensing enforcement discretion for short-term, reasonable measures taken to comply with the COVID-19 requirements for social distancing and limiting the gathering of people, provided general food safety practices are maintained. Enforcement discretion is specifically because of COVID-19 and public health control measures.”

Farmers’ markets or groups of farmers, even without licenses, could do some multi-farm bundling and delivery of orders now to support social distancing, but would have to get licensed to keep up those practices after the enforcement discretion period ends.
Aggregation of Products During COVID-19 Crisis: Cottage Food not included

Enforcement discretion for aggregation of products does not extend to cottage food items.

• Cottage Food Producers (CFPs) still have to personally deliver their products to their customers.

• Entities that aggregate products can help CFPs advertise their products, but cannot handle payments on behalf of the CFPs.
Licensed Local Food – products sold by others than the farmer who grew it:

Wholesale Produce Dealer License

* Totally separate from food licenses!
* Protects COMMERCE, not food safety.
Licensed Local Food – products sold by others than the farmer who grew it:

Wholesale Produce Dealer License

Covers produce, poultry products, egg products, milk and milk products
Licensed Local Food – products sold by others than the farmer who grew it:

Wholesale Produce Dealer License

Does not apply to collaborative arrangements among farmers (i.e. farmers’ market aggregation)
Licensed Local Food – added off-farm ingredients

- Bakery products
- Flavored honey or maple syrup products
- Pickles, salsa, fermented products
- Jam, jelly, fruit syrup
- Multi-ingredient products: soups, salads, sandwiches, sauces, spring rolls

http://misadocuments.info/AppendixB_LocalFood_Sourcing_Produce_Other.pdf
Water

APPROVED WATER SUPPLY
For Rural Food Businesses

This fact sheet is for Minnesota rural and on-farm food business owners. All water used in food service or food manufacturing must come from an approved source.

Minnesota laws on water source:
Minnesota Rules 4626.0980
http://www.revisor.leg.state.mn.us/rules?id=4626.0980

Minnesota Rules 4720
http://www.revisor.leg.state.mn.us/rules?id=4720

Minnesota Rules 4725
http://www.revisor.leg.state.mn.us/rules?id=4725

Minnesota Statutes 31.175
http://www.revisor.leg.state.mn.us/

construction code in place at the time the well was installed, and isolation distances have been maintained. If your days of operation and number of people present per day are more than 25 people on 60 days per year, see the sidebar: "What if my on-farm food business really takes off and I have a lot of people coming around?"

Your location’s private well.

If your farm or rural business is not connected to a public water supply, you can, as part of the licensing process, request approval of a private well on the property as an approved source of water. The well must meet the Well Code in order to be approved. Key components of the approval process are onsite inspection, review of well construction records, submission of water test results, and verification of isolation distances.

Public water supply.

If your farm or rural business location is already on a municipal or other type of public water supply, that is considered an approved source.

Note: While the public water supply is considered an approved source, there will still be a requirement for

Onsite Inspection
Water

Private Well?

• Must be constructed to Well Code

• Must have construction record (these were required after 1974)

• Must maintain isolation distances

• Water test for total coliform bacteria, nitrites/nitrates
Protecting Your Well

Selected Well Isolation Distance Requirements
(See Minnesota Rules, chapter 4725 for a complete list of requirements.)
Water

Private vs. Public Water Supply Threshold:

25 people served on 60 or more days of the year
“Serving” means having those people physically present in the location. You may have a rural meat processing plant that sends thousands of pounds of meat out the door per year, but the 25 people and 60 days applies only to people such as employees who are regularly present at the plant.
https://www.health.state.mn.us/communities/environment/water/mwi/index.html
https://www.health.state.mn.us/communities/environment/water/mwi/index.html
https://www.health.state.mn.us/communities/environment/water/mwi/index.html
Food & Beverage Service
No Dining-In during COVID-19 Crisis:

- Food & beverage service establishments can still operate, with ordering and take-out only.

- Food & beverage service establishments still must be properly licensed.

- Food deliveries are allowed.
Come and get it!

**DO I NEED A LICENSE?**

Before you ring the dinner bell - Let’s discuss what you want to do.
MINNESOTA STATUTES 157: FOOD, BEVERAGE, AND LODGING ESTABLISHMENTS

Minnesota Statute 157.16: License Required

Minnesota Statute 157.22: Exemptions

https://revisor.mn.gov/statutes/cite/157
I want to host a POTLUCK

I want to feed my friends and family

N

Y

are you REALLY close friends? or...

Y

are you REALLY related to them?

N

Y

did guests bring "ready to serve" homemade dishes to share?

Y

PROBABLY NOT

But, if you think they will sue you if they get food poisoning... you might want some

Y

did you tell ONLY these people they could come?

Y

did you put up a flyer, post it to social media or otherwise blab about it?

N

whole other issue!
What is a potluck?
What is a potluck?

Minnesota Statute 157.22 (Subdivision 8):

[No license is required for] food not prepared at an establishment and brought in by individuals attending a potluck event for consumption at the potluck event. An organization sponsoring a potluck event under this clause may advertise the potluck event to the public through any means. Individuals who are not members of an organization sponsoring a potluck event under this clause may attend the potluck event and consume the food at the event. Licensed food establishments other than schools cannot be sponsors of potluck events. A school may sponsor and hold potluck events in areas of the school other than the school's kitchen, provided that the school's kitchen is not used in any manner for the potluck event. For purposes of this clause, "school" means a public school as defined in section 120A.05, subdivisions 9, 11, 13, and 17, or a nonpublic school, church, or religious organization at which a child is provided with instruction in compliance with sections 120A.22 and 120A.24. Potluck event food shall not be brought into a licensed food establishment kitchen.
Church Lady Law

Minnesota Statute 157.22, Subdivisions 2 & 12
Weddings, funerals, fellowship meals

Since 1995, a licensing exemption has been in place that allows faith-based communities to serve food at weddings, funerals, and fellowship meals within the house of worship. Those are considered private events for the faith-based community “family,” even if visitors may attend.
In 2012, an exemption was added to allow faith-based communities to serve food at fundraisers or community events conducted in the building or on the grounds belonging to the faith-based community.
Church Lady Law

- There must be a certified food protection manager or a trained volunteer who trains food preparation workers in food safety

- U of MN Extension offers “Cooking Safely for a Crowd”
Fraternal, Sportsman, & Patriotic Organizations Exemption

Tax-exempt fraternal, sportsman, or patriotic organizations can hold fundraiser meals in their building or on their grounds; with home-prepared, donated food.

M.S. 157.22 Subdivision 7
University & College Exemption

Colleges and Universities that have gone through a process to establish their own health code are exempt from food licensing in buildings they own or operate.

M.S. 157.22 Subdivision 3
Soup & Chili Cookoff Exemption

Cook-off contests run as fundraisers by non-profit organizations are exempt from licensing. The language of the statute does specify “soup or chili.”

M.S. 157.22 Subdivision 14
2019: Food Stand Exemption

- Less than $1,000/year in sales
- Operated as a Special Event or Seasonal Temporary Food Stand, with the 10- or 21-days of operation restrictions
- Operated on private property

M.S. 157.22 Subdivision 15
2019: Food Stand Exemption

- No restrictions on type of food; food need not be approved source.
- If potentially hazardous food is served, there must be a sign:

“The products sold at this stand are not subject to state inspection or regulation”
I want to host a POTLUCK

N

I want to feed my friends and family

N

are you REALLY close friends? or...

Y

are you REALLY related to them?

Y

did you put up a flyer, post it to social media or otherwise blab about it?

Y

whole other issue!

Y

did guests bring "ready to serve" homemade dishes to share?

Y

PROBABLY NOT

But, if you think they will sue you if they get food poisoning... you might want some
I want to feed ANY other people

are you thinking about the following menu items?

Wood Fired Pizza

or

Pancake Breakfast

or

Fancy Schmancy Dinner

or

Coffee and Pie

You need a license
I want to feed ANY other people

are you thinking about the following menu items?

how about

Soda and Peanuts

MAYBE - MAYBE NOT

but... how is your "on-farm food" experience any different than going to a gas station?
I want to feed ANY other people

But, what if...

there's just food around and people eat it
or...
I don’t take money, just donations
or...
I have everyone sign a waiver
and...
and...

If ands or buts were candy and nuts, then every day would be Christmas.
What if there’s just food around and people eat it?

“If your farm business is serving food to the public, the licensing process applies. Serving food on your farm may be done for business reasons even if the product is free. If serving food boosts your farm’s name recognition, builds awareness, advertises products, or simply builds goodwill in the community for your farm, it is part of the business.”

-- Attorney Rachel Armstrong, Farm Commons; quoted in *Come & Get It!* (p. 8)
What if I just take donations?

Minnesota Statute 34A.01 Subdivision 12:

**Sell; sale.**
"Sell" and "sale" mean keeping, offering, or exposing for sale, use, transporting, transferring, negotiating, soliciting, or exchanging food; having in possession with intent to sell, use, transport, negotiate, solicit, or exchange food; storing, manufacturing, producing, processing, packing, and holding of food for sale; dispensing or giving food; or supplying or applying food in the conduct of any food operation or carrying food in aid of traffic in food whether done or permitted in person or through others.

[https://revisor.mn.gov/statutes/cite/34A.01](https://revisor.mn.gov/statutes/cite/34A.01)
What if I have everyone sign a waiver?

“The law applies regardless of whether the guests want it to apply or not. Asking individuals to waive their rights or give your farm permission to serve from an unlicensed facility will not defeat the law.”

--- Attorney Rachel Armstrong, Farm Commons, quoted in Come & Get It! (p.8)
I want to feed ANY other people

But, what if...

there's just food around and people eat it
or...
I don't take money, just donations
or...
I have everyone sign a waiver
and...
and...

If ands or buts were candy and nuts, then every day would be Christmas.

You STILL need a license
Certified Food Protection Manager

If you need a license, you may also need to employ or become a Certified Food Protection Manager (CFPM).

M.S. 157.011;
MN Rules 4626.0025 – 4626.0035
Certified Food Protection Manager

* The CFPM is responsible for ensuring food safety in your food and beverage service operation.

* The CFPM trains other staff in food safety, and appoints a Person in Charge (PIC) for each shift.

* There must always be a PIC present when the business is operating.
CFPMs are not required for:

- Low-risk food establishments
- Special event food stands
- Establishments licensed as “Retail Food Vehicle/Portable Structure or Cart”
- Establishments with very limited types of food handling

MN Rules 4626.0033
How do you become a CFPM?

- Take training class and pass an approved exam.
- Receive your exam certificate
- Send an application, your exam certificate, and a $35 fee to the Minnesota Department of Health.
Questions?
Okay, how do I get a license?
Licensing and inspections are ongoing during the COVID-19 crisis.

If you want to start a new food business, the agencies will work with you.
Jurisdiction
Ag

Product Sales

Health

Food & Beverage Service

Wikipedia Commons

Minnesota Statute 28A

The Wallpaper Co.

Minnesota Statute 157
Jurisdiction

Ag: Food Processing

* Food manufacturing:

processing of raw ingredients into packaged foods such as jars of pickles, frozen pizzas, boxes of cereal, cartons of milk
Jurisdiction

Ag: Product Sales

* Food handling:

Buying and selling of packaged food products, bakery products, bulk food in dispensers, raw meats, or whole, raw fruits & veggies
Jurisdiction

Ag: Product Sales

* Farmers’ sales of their own farm products
Jurisdiction

Ag: Other Commercial Food Activities

* Other food things that don’t fall under the jurisdiction of the Minnesota Department of Health

(example: meat slaughter & processing)
Jurisdiction

MN Department of Health

Food and beverage service: preparing and serving foods to individuals
Jurisdiction

Health

Food & Beverage Service

Minnesota Statute 157
Jurisdiction

Physical Location

51% Rule
Jurisdiction

Physical Location:

1 food license (either Ag or Health)

- per location

- per legal entity
Jurisdiction

51% Rule:
The majority of dollar sales at a location determines the license type
Jurisdiction

51% Rule:

Applies to Licenses, not Facilities and not Processes.

(You always need the appropriate equipment and process for what you’re doing.)
Licenses

Minnesota Department of Health

License Types:
Licenses

Special Event Food Stand

Food cart

Seasonal Temporary Food Stand

Seasonal Permanent Food Stand

Mobile unit (food truck)

Food & Beverage Establishment – Category 1, 2, or 3

Minnesota Statute 157.16  https://revisor.mn.gov/statutes/?id=157.16
Licenses

MDA License Types:

* Retail Food Handler

* Wholesale Food Handler

* Wholesale Food Manufacturer/Processor

* Food Broker
License Fees

What do MDH licenses cost?

Special Event Food Stand: $55/yr

Seasonal or Mobile: $85/yr

Food Establishment:
Annual base fee: $165/yr +
additional $110 to $385
depending on risk category
License Fees

Additional one-time cost for Plan Review for retail licenses.

MDH Plan Review fee:

- Not required for Special Event Food Stand
- $250 to $500 for other license types, depending on risk category
License Fees

What do MDA licenses cost?

Retail Food Handler: $77/yr

Wholesale Food Handler: $57/yr

(These are the lowest rates. Fees increase as annual revenue increases.)
License Fees

Additional one-time cost for Plan Review for retail licenses.

MDA Plan Review fee: $200 to $425, based on square footage
Getting Stuck in the Food Licensing System
Licensing
Product Sales
Food & Beverage Service
Local Food System

Ag
Product Sales

Health
Food & Beverage Service

Local Food System
Be alert to situations that need clarification!

Ag + Delegated Authorities

Health + Delegated Authorities
MN Dept. of Health Map of Delegated Authorities

www.health.state.mn.us/divs/eh/food/license/delegation.html
Tribal lands within MN state boundaries
MDA has 7 delegated authorities

BUT only delegates authority for retail food facilities

(No delegation for wholesale handling or manufacturing or meat)
MDA delegated authorities cannot be more restrictive than the MDA. The state food code is a minimum and maximum code for MDA.

M.S. 28A.06
* Delegated Authorities under both MDA and MDH may have different license names and fee structures
Break – followed by scenarios to be discussed in small groups
1. A farmer wants to construct an on-farm commercial-grade kitchen to manufacture a food product for local and regional sales.

[County with Health delegation]
KZ - The K family is putting in a commercial kitchen on the farm. County guy says commercial kitchen is a restaurant so needs a hood; MDA says no hood ....... no resolution.

J. - Is this a commercial kitchen for food processing/product manufacturing, or are they doing on-farm food service?

KZ - They are doing: food processing/product manufacturing.
J. - In that case the local delegated authority shouldn't have jurisdiction over it -- it's MDA jurisdiction. The only thing County should be dealing with is the zoning, septic, and water.

KZ – K. is reluctant to really piss off his local - because that's who he has to deal with long term, right?

J. - Why does he have to deal with his local guy in either the short or the long-term? If he's doing food manufacturing/processing, his inspector should be an MDA inspector -- not the local guy.
Epilogue, 3/21/17:

K. had gone back and forth between the local delegated authority and the MDA inspector over the ventilation hood requirement, and finally the local delegated authority person had thrown up his hands and agreed it was MDA’s call.
2. Multi-location food service with central office space wants to set up a walk-in cooler at the office for collection & distribution of local veggies to their own feeding sites.

[City with both Ag and Health delegation authority]
3. Food entrepreneur wants to manufacture a packaged dry snack product out of a rented commercial-grade kitchen and sell it to grocery and convenience stores.

[City without delegation authority]
4. Local farmers’ market wants to collect produce from multiple vendors to fill orders from schools, hospitals, & restaurants in that county and adjacent counties.

[County without delegation authority]
5. Event planner wants to arrange an on-farm festival that includes a dinner with ingredients sourced from several local farms, plus a pop-up farmers’ market.

[County with Health delegation]
6. County SHIP coordinator wants to establish a Farm to School program in a school district, with direct purchasing of food from area farmers.

[County with delegation]
7. Local civic group wants to offer a summer lunch program for area youth on three days per week.

[County with delegation]
Ag

Product Sales

Health

Food & Beverage Service

Local Food System
Don’t Stay Stuck!
Reach out for help:

- Agree with your inspector to ask for clarification from agency supervisors
- Contact agency supervisors on your own
- Contact an organization to help you get clarification from agencies
Food
Innovation
Team
Innovation Team Intake Pathways

Delegated authorities → MDA Food & Feed Division administrators → MDH → Community-based groups with food system expertise

Innovation Team
- MDA
- MDH
- Delegated authorities
- Local food/maker community groups
- License applicant
- Ad hoc experts
Thank you!

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www.misa.umn.edu/resources/blazing-trails

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