

Farmers Market Integrity and Farm Verification

Chapter 6: Happy Vendors, Happy Managers

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Regardless of the nuances of your market policies, shoppers come to farmers markets expecting to buy farm products directly from the farm that grew, raised, or processed them. Likewise, farmers expect there to be a “fair playing field” among vendors. And market managers expect vendors to clearly and completely represent their farm and products sold at market. These expectations play a major role in how much shoppers, vendors, and managers “trust” the market. This trust is rooted in the history of farmers markets where “getting rid of the middleman” – and potential fraud – was a driving force. The direct and authentic connection between farmers and shoppers is one of farmers markets’ core distinguishing features.

Trust in the market is also a hallmark of farmers markets’ future. Across the country, the number of new markets and new vendors has grown alongside farmers markets’ popularity. And as the workhorse of the local foods movement, farmers markets’ mission has expanded from providing alternative sales opportunities for farmers to building community spaces, fighting hunger, incubating new farmers, educating shoppers about healthy eating, and modeling environmental practices.

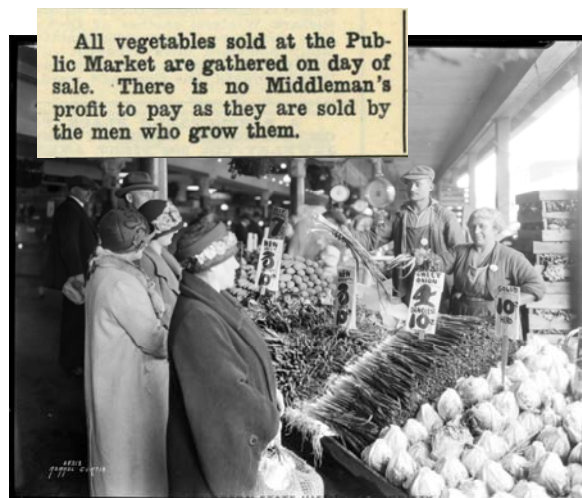


Figure 1. Washington Historical Society Collections, Pike Place Market. Asahel Curtis, photographer, May 1925.

Amid the growth, success, and expanding role of farmers markets, opportunities for misrepresentation have also increased – as have the accusations and media attention. Farmers markets in Los Angeles have been subject to a series of articles with headlines like “L.A. Farmers Markets Exposed,” “...Tip-Offs that can help you avoid farmers market cheaters,” and “Stamping Out Farmers Market Fraud.” Fortunately, Washington State has not shared this experience and is working to create a program that will ensure the public trust in farmers markets.

Range of Trust Issues

Given the independent origins of our expectations, it's no surprise that exactly how trust becomes compromised is often in the eye of the beholder. In the context of market integrity, there is no single issue that undermines our trust. There are a range of issues, each unwittingly difficult to define, agree on, and enforce.

Misleading or vague signage

At the market booth, signage is a tangible way that the vendor represents his/her business to shoppers as well as representing each individual product. This may be in the form of price signs, banners, or other display items. The chief concern is when the signage makes potentially misleading claims or overly vague claims that can't be verified. "No sprays" is a good example. What does this really mean? A spray is a delivery mechanism. The inference is that no pesticides, herbicides or fungicides have been applied during production. However, even ecologically benign substances may be sprayed. The key point is that the claim is overly vague and plays on shopper assumptions. Even if there were a way to prove that there were "no sprays," it would not prove that there were no toxic substances used. The term "natural" is another problematic claim in that, with a few exceptions for meat products, it is completely unregulated. The challenge is that most shoppers *think* the term represents some sort of standard or defined set of production practices. And most accept any marketing and production claims without question.

Of course, there are valid certification programs and labels used by farmers at farmers markets. To help sort out what's what, Animal Welfare Approved publishes a booklet called "[Food Labels Exposed: A definitive guide to common label terms and claims](#)" that is free and available online. It defines key terms and identifies labels that are third party verified. "Organic" can be tricky at farmers markets because USDA allows farms selling under \$5,000 a year of organic products (from all markets) to be exempt from going through organic certification process. However, these farms are still required to comply with all organic requirements.

The absence of signs also creates challenges for the manager and shoppers. Aside from curtailing sales, it makes it extra difficult to know what claims are being made by the vendor.

Supplementing or "carrying" farm products

A second accusation that erodes trust is that a farm is supplementing or "carrying" farm products that he/she bought or traded *and is passing them off as their own*. In this case, the farm typically does grow the products in question. So, those crops would have been approved to bring to market. And then something happened. Perhaps they ran out, harvest was delayed, there was some sort of crop failure, or the quality was compromised in storage or transportation. We all know farming is risky.

For very good reasons, some markets allow supplementing in their market policies. These policies can be grandfathered in or idiosyncratic which can make it harder to really know “what the rules are” and make the rules seem very complicated. The challenge is when “external” products are brought in *without the market’s knowledge or approval* and shoppers are led to believe the farm itself grew, raised, or processed the item.

Selling products that the farm didn't grow or raise

Like supplementing, selling products that the farm vendor didn’t grow, raise, or process may be allowed by the market policies. This is also known as reselling. “Resellers” is a WSFMA vendor category; see WSFMA “Roots Guidelines.” There are some markets that are “producer only,” meaning they do not allow Resellers. However, in Washington State, there are times when a market must rely on resellers due to their location, the time of year, or the needs of their shopper base. The problem of reselling takes various forms:

- 1) The farmers market policies do not allow resellers and a vendor is accused of “being a reseller” or other equivalent terms.
- 2) The farmers market policies allow reselling,
 - however the vendor applied as a **farmer** or was not entirely transparent about any reselling;
 - the vendor has applied as a **reseller**, but not abiding by the rules;
- 3) A market does not enforce the policies it has or does so inconsistently.
- 4) A market has “grandfathered in” resellers which may work. But it may also confuse new vendors and shoppers alike.

Workers misrepresenting their relationship to the farm

As farms grow and go to more and more markets, they may hire employees just for selling at the markets instead of sending family or farm employees. This makes sense and isn’t necessarily a problem if they are well trained about the farm, products, and how farmers markets work. The challenge is when there is someone working on behalf of a farm and the relationship is not clear. The concern is that the person is working semi-independently and presenting himself/herself as a full member of the farm business. Here again, the issue is that the lack of transparency can compromise trust in the farm and which can risk damaging the reputation of the market and other farmers at the market.

While no one likes not being told the whole story or being misled, intentionally or not, there are varying degrees of seriousness. One key question to evaluate is whether information is intentionally being withheld or whether there was a mere

misunderstanding or missed expectations for some reason? This generally can be dealt with by improving communication and hands on support.

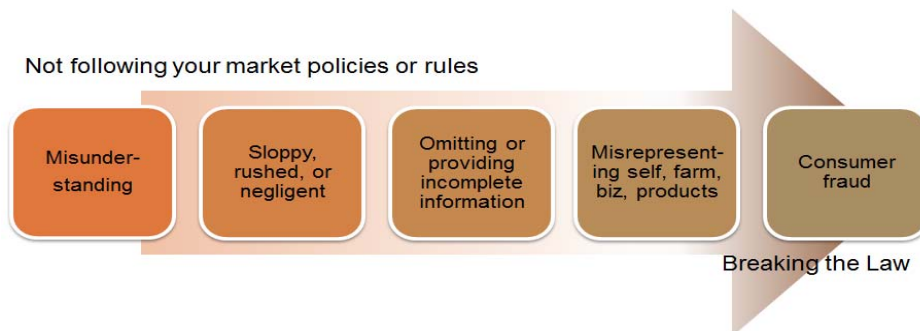


WSFMA "Roots Guidelines" on Resellers

Resellers are vendors who buy produce from farmers in Washington State, or the border counties, transport it to a WSFMA Member Market, and resell it to the consumer. **Resellers** are allowed to sell at WSFMA Member Markets, but do have strict criteria to follow:

1. **Resellers** are expected to be the only stop between the grower and the consumer. The product they buy must not come from shippers, warehouses, jobbers or wholesale distributors.
2. They must not sell any produce not grown in Washington State or the border counties (For example: oranges or bananas).
3. They may sell any produce they grow themselves on their own property (see **Farmers**).
4. **Resellers** are sellers of crops that cannot be grown reliably, or are not offered for sale in sufficient quantity, by **Farmers** selling at a given WSFMA Member Market, as determined by the individual WSFMA Member Market's governing body.
5. **Resellers** must have all crops pre-approved by the Member Market's governing body before delivering the crops to market for sale. Approved, resold crops must be specifically limited, so as not to compete with the crops of **Farmers** within the geographic vendor boundaries of the WSFMA Member Market, as defined by the Market's policies and by-laws.
6. All **Resellers**, or **Farmers**, must label their products as being resold if they are not selling products which they have grown, raised, or harvested themselves on property that they own, lease, or rent.
7. All information declaring which products are resold must be available and displayed for the consumer to easily read. Signage must clearly state which farm(s) produced the products; other terms synonymous with "resold" may be substituted.
8. **Resellers from border counties are not allowed to sell at WSFMA Member Markets.**

The situation becomes more serious if you determine that market policies have been broken. Market policies are a form of "private regulation" that has been approved by your governing body (usually the board) as a condition of participation in the market. Ostensibly, your market has the same "agreement" with all vendors.



The most serious situation is when a vendor is violating a WSDA, USDA or health department regulation of some sort or even breaking the law. The rules governing farmers market vendors can be daunting to track so it may be genuinely unintentional. In these cases, the situation is not governed by market policy. However, in some cases, the market is looked to as being responsible for enforcing these regulations which can muddy the water.

Support for a Market Integrity Program in Washington

While there is no evidence that misrepresenting products is a problem at Washington farmers markets, there is significant support to work together and develop a program to ensure the integrity of farmers markets.

- In a 2012 survey of farmers market farm vendors, 75% of respondents agreed or strongly agreed that “There should be a way to verify that all farm vendors at Washington farmers markets are farmers” (N = 507).
- Over 85% of farmers agreed or strongly agreed that “Products that are purchased and resold at farmers markets should be clearly labeled as such” (N = 506).

Integrity

consistency of values, expectations, actions, methods, and ethics

Among farmers market managers,

- 41% currently require some sort of farm audit, farm visit, farm inspection, or third party verification for farm vendors (2014, N = 32).
- Perhaps more telling, 91% of market managers reported that they were concerned or very concerned with ensuring their market integrity (2014, N = 32).

Despite the desire of vendors and managers to ensure their markets’ integrity, it is enormously challenging for individual markets to take on that task. In the 2014 survey of managers, “not enough time” was the number one challenge followed by concerns about knowing how to do a thorough farm visit.

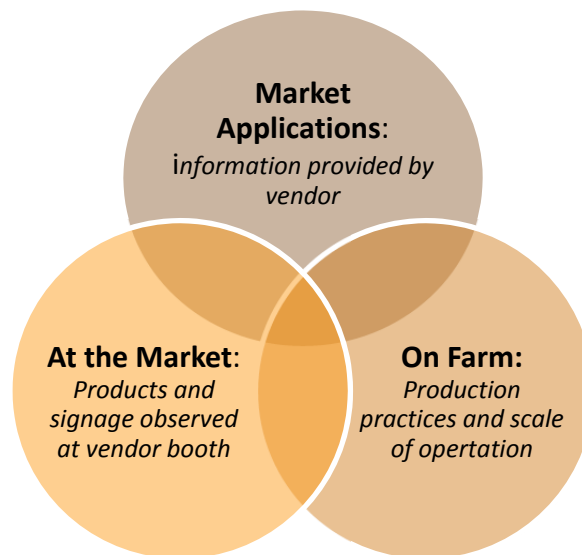
Biggest challenges	Percentage
Not enough time to visit farms	33%
Concerns about having enough knowledge to conduct a thorough farm visit	21%
Not enough money to visit farms	15%
It is hard to visit farms (more generally)	15%
Communication barriers	9%
Concerns about relationship with vendors	6%
N = 33	100%

An advisory team of market managers, farmers, and representatives from the WSDA Organics Program, Washington State Farmers Market Association, and WSU has been working on the question of market integrity with support from a USDA FSMIP grant.

The project started by researching how other farmers markets tackle this issue in other states. In California, for example, there is a Certified Farmers Market and Certified Producer program run by the state Department of Food and Agriculture with on-the-ground support from County Ag Commissioners. This program was created by legislation and is mandatory. Some larger market associations, such as Greenmarket in New York City, have an in-house, staffed “audit” program for their over 240 farmers and 50 plus markets. Another approach is to require vendors to have an independent, third-party certification (e.g., certified organic). So, in Chicago at the Green City Market, vendors are required to have one of eight pre-selected independent certifications. The Fulton Street Farmers Market in Grand Rapids, MI exemplifies another approach. Their “100 Homegrown” program is run by the market and is voluntary for their vendors. Each approach has its pros and cons, including how much it costs to run and how rigorous the criteria are to verify who the farms are and what they grow or sell.

Given the limited capacity to support direct marketing farmers at the county or state level, a market-led, voluntary program with a common set of standards, protocols, and cost-effective inspections seems to be the most practical approach for Washington State. The goals are to provide a key service to markets and to help farmers build their businesses. Ultimately, a robust, fair market integrity system will create a further marketing distinction among shoppers for everyone involved.

One key strategy to market integrity is triangulating between the information provided on the market application, the products a farm has on their table at the market, and what is growing or being raised on farm. Each point of reference should be reinforced by the other two. Likewise, a “red flag” in one can be double-checked by knowing what’s happening in the other arenas.



Market Applications

Market integrity and vendor verification starts with the information you ask for in your market application. The application is a market’s primary tool for requesting important information from the prospective vendor. It is also when your market’s general expectations, rules, and policies are formally given to all vendors. The information provided by vendors in the application is the basis of your written record about that vendor. Furthermore, it is information provided *by the vendor*. Therefore, trust is involved: the vendor is sharing personal, maybe even proprietary information about their livelihood; while the market is making a business decision (i.e., who to allow to sell) based on what the vendor provides.

There is a huge range of market application styles, often paired with market policies, rules, and occasionally even surveys. Borrowing from the idea of a common college application, the project team has been working on a “Common Vendor Application” for Washington State farmers markets. The goal is to streamline the number of applications that vendors have to fill out each season and the information markets receive.

From the market integrity perspective, the following information is helpful to include in your application. Part of the goal is to collect information *provided by the vendor* that you can verify through a “desk audit,” meaning you can look up public records online or from your own resources (database, hard files, etc.). This helps to surface any “red flags” – areas that are incomplete or seemingly inconsistent – so that you can ask for clarifying information or documentation.

You may also consider including a statement in your application stating that it is the vendor’s responsibility to keep market management apprised of any changes in the information provided.

	Information Requested	Comments
BUSINESS IDENTIFICATION	Business Owner’s Name	The business <u>owner</u> may not be the person filling out the application or even selling at the market. Important to know in case further information is needed.
	Business entity name	This may not be the name the farm goes by at the market. It is easier to look up information if you know what name the licenses, insurance may be under.
	Trade Name/DBA	A vendor may go by a trade name or “DBA” (Doing Business As) at the market instead of the name the business used when it was incorporated.
	UBI/Tax Registration Number	The Universal Business Identifier or “UBI” is like a business’ Social Security Number. It is a proxy for how formalized it is and can be used to look up other information. You can look up businesses at: http://dor.wa.gov/content/doingbusiness/registermybusiness/brd
LOCATION	Mailing address	This may be a PO Box or a physical address.
	<u>Primary</u> physical address for the business	This may or may not be where the vendor lives. You can look up this address on Google maps, Google Earth, or the county property records to confirm information provided by the vendor.
	Locations where products sold at the farmers market are	Many farms or businesses have multiple locations where they make or store products sold at market. Sometimes these locations are an hour or

	raised, produced, processed, or made	<p>more away from the primary location. Information about each location is needed to fully account for the products’ production, processing, and/or storage as well as its chain of custody. There may not be a physical address available.</p> <p>You can ask for the location name, parcel number, size, a description of any infrastructure (greenhouses, hoop houses, processing area, dry and/or cold storage, etc.), and the owner’s name. Should you need to do an on-site inspection, you may need the permission of the owner. Photos taken by smart phones that give the GPS coordinates may also be useful.</p>
	Acreage	<p>For farms, acreage may be owned or leased. The leases may be formal or informal; written or verbal. Alternatively, there may be a “crop share” arrangement. This seems to be fairly common with tree fruit where someone is “paid” with a percentage of the harvest in exchange for managing or doing all the labor for a particular block or orchard.</p> <p>Keep in mind that not all the acreage may be used for products sold at farmers markets. The products may be going to other markets, fallow, leased to someone else, or have other uses.</p>
PRODUCT INFORMATION	Crops and nursery	<p>For each crop or nursery product, <i>ideally</i> you would know:</p> <ul style="list-style-type: none"> ▪ Location where it is grown, raised, processed ▪ Crop or nursery – general ▪ Variety or type -- specific ▪ Growing season (month to month) ▪ Harvest season (month to month) ▪ Amount or unit (acres, rows, square feet, etc.) ▪ Estimated production (lbs. / count)
	Livestock and animal products including honey	<p>Again, ideally, you would know:</p> <ul style="list-style-type: none"> ▪ Location where it is grown, raised, processed ▪ Species ▪ Breed ▪ Amount raised ▪ Harvest season (month to month) ▪ Estimated production (lbs. / count)
	Value-Added and other Processed Products	<p>This might get tricky as different stages of production or storage take place at different locations. Again, ideally, you would know:</p> <ul style="list-style-type: none"> ▪ Location where product processed ▪ Product (what is it) ▪ Ingredients ▪ Source of ingredients ▪ Processing facility ▪ Units produced ▪ Licenses held by producer (WSDA Food Processing License or Facilities, Cottage Foods Permit, Dairy licenses)
	Specialty Licenses	<p>These are attached to the UBI or main business license and issued by State of Washington Business Licensing Service. You can look up state-issued licenses up at http://bls.dor.wa.gov/licensesearch/. The most common Specialty Licenses that are needed by farm vendors are:</p> <ul style="list-style-type: none"> ▪ Egg Handler/Dealer ▪ Liquor License ▪ Nursery retailer/wholesaler ▪ Weighing and measuring devices (also known as “scale license”)
	Other Licenses and Permits	<p>In addition to the licenses issued by the Washington State Department of Revenue and Business Licensing Service, there may be other licenses that</p>

<p>Organic Certification</p> <p>Many farms “grow organically” without being certified. A good application question would be: Are any of the products you plan to sell certified organic? If so, who is your current certifying agency?</p> <p>Also, each WSDA application requires the farmer to submit a “site map.” You can ask for a copy.</p>	<p>are required for some producers.</p> <p>This is a voluntary and optional certification but as one of the few (if not only) certification that is regulated by the USDA, it tends to hold greater weight among consumers. Most producers in WA are certified by the WSDA. Other certifiers include Oregon Tilth and CCOF in California. The WSDA lists all producers’ products that it certifies by county and publishes this online. http://agr.wa.gov/FoodAnimal/Organic/docs/wsdacertorgproducers.pdf</p> <p>The USDA maintains a database of <u>all</u> certified organic operations. You can sort by state and city:</p> <p>USDA Organic Integrity Database: https://apps.ams.usda.gov/integrity/</p>
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Reselling

Just under half of the farmers markets in Washington allow some form of reselling. Most markets that do not allow reselling state that in their policies and on the vendor section of their website. However, it is less common to see this clearly spelled out on the market application. More typically, the market will have a question about “vendor type” and include Farm Vendor, Processor, Artisan/Crafter, and Prepared Food, but not “Reseller.” If vendors have not read the market policies and went straight to the application and they are reselling, they may check Farm Vendor because there is no Reseller option or they don’t understand how this is defined. Therefore, if your market does not allow reselling, consider restating this in the application itself in multiple ways.

The information you get depends on how you ask the question as well as what you ask. For example, asking may reveal different information than

Good	Better
<p>Where do you make or grow X?</p> <p>Do you produce all of these products yourself?</p>	<p>Where does X product(s) come from?</p> <p>Who grows/raises/processes the products you will be selling at the X farmers market?</p> <p>Or</p> <p>What percentage of the products you will be selling at the X farmers market does your farm business grow/raise/process?</p>
<p>Do you resell?</p>	<p>Do you sell any products at farmers markets that your farm/business did not grow, raise or produce? This includes products purchased or traded from any other source, including neighbors.</p>

If your market allows reselling, ask: What products do you resell?

- Product
- Variety
- Amount (lbs. or count)
- Season brought to market? (month)

- Source of Product
- How will resold products be labeled?

Farm Visits or Inspections

Since Washington does not have a legislated certified producers program and market managers are not government employees, you do not have the “right” to go on other people’s property. Therefore, in order to set the market up to be able to inspect the farm or vendor business, include language in the signed application that makes it clear that this is a possibility, when it might happen, and that it is condition of being accepted into the market (or whatever your policies state).

For example:

“In order to sell at the XYZ FM, all vendors will grant permission to the XYZ FM coordinator or designated representatives to request and review farm records and to inspect all production sites (including own or leased land, greenhouses, processing facilities, dry storage, cold storage) used to grow, store, and process agricultural products sold at the XYZ FM. Farm visits will be conducted with at least 24-hour notice. To ensure the integrity of the farmers market, farmers are responsible for providing material evidence or other reasonable proof that they have grown 100% of the products that they sell at the XYZ FM. The lack of evidence or material evidence of reselling products grown by another farm will result in removal of the farm product and may lead to the revocation of the farmer’s permit to sell at the XYZ FM.”

At the Market

Part of a market manager’s job is to observe vendors’ products and signage throughout the market day and season. In terms of market integrity, some of the things to look for include:

- Does the vendor have the correct banner or signage up about their business? Does the name, location, and other information match what is on their application?
- Do the products on the vendor’s table match the products that you approved or were listed on their application? Do the varieties, seasonality, and amounts seem consistent with what they wrote on their application?
- Is the product quality (i.e., permanent features like color, scars, size, and shape) and/or condition (i.e., factors that get worse over time like bruising, decay, discoloration) consistent? Or does it vary from box to box or market day to market day?

- ❑ Is the product signage correct in terms of any production claims (e.g., certified organic)?
- ❑ Do the containers used have the farm or business name on them?

“Red Flags”

If the answer to any of the above questions is “no” or “not sure,” then you may have a “red flag.” At the market, this could be:

- ✓ Inconsistencies between what is written or you were told and what you see;
- ✓ Observations that contradict what is written, you were told, or know; and
- ✓ Counterintuitive observations about seasonality, quality, past seasons, etc.

A “red flag” does not necessarily mean that a vendor is guilty or out of compliance. It simply means that it may be time to respectfully ask for more information or documentation to clarify the situation. If at all possible, a market manager’s strongest position is when the information or documentation you need is part of the market application and/or policies. Above all, it is critical to be consistent among vendors and maintain professional, fair, and objective responses to red flags. It is also critical to document any observations -- and your responses -- in writing or with photos; and to keep all vendor files well organized, dated, secure and confidential.

Product Claims and Signage

Creating norms and standards around what product claims are allowed at farmers markets is sure to be an important discussion in the near future. For now, only certified organic products are regulated by a governmental body. Some markets, such as the Santa Monica Farmers Market, have prohibited signs stating “No Sprays” because “it is vague and misleading.” They do still allow vendors to use signs that say “No Pesticides” and “No Chemicals”¹. For a complete inventory of certifications and what they mean, see the Animal Welfare Approved’s “Food Labels Exposed: A definitive guide to common food label terms and claims” <http://animalwelfareapproved.org/food-labels-exposed/>.



Organic Labeling at Farmers Markets

<https://www.ams.usda.gov/sites/default/files/media/Organic%20at%20Farmers%20Markets.pdf>

“Farmers and vendors who use the word “organic” to describe their products or practices in the marketplace must comply with the USDA organic regulations. The Organic Foods Production Act (OFPA) states that no person may affix a label to, or provide other marketing information concerning, an agricultural product if that label or information implies, directly or indirectly, that such product is produced and handled using organic methods, except in accordance with the OFPA. Most farms and business that grow, handle, or process organic products must be certified. The only exception is for producers and handlers that sell less than \$5,000 per year of organic products. These operations may choose to obtain certification but they are not required to do so.”

¹ City of Santa Monica Farmers Markets “Rules, Regulations, and Policy Guide” updated June 2013. <https://www.smgov.net/portals/farmersmarket/>

Vendor Grievances and Product Challenges

It is not without precedent that, on occasion, vendors may share their concerns about the integrity of other vendors with the market manager. Unfortunately, this sometimes includes rumors, gossip, allegations, and speculation, all communicated with spirited conviction.

Ideally, your market staff should be trained on how to respond to such situations before the season starts. This may include:

- ✓ Review any written policies that your market has about how to respond. If the market does not have any written policies, are there any precedents or norms within the market that the staff should know about?
- ✓ Update and make copies of any forms that may be needed. Keep copies at the Information Booth.
- ✓ If there is an anticipated challenging situation, consider roll playing how the conversation between the vendor and market staff may go so that the situation remains emotionally neutral if and when it happens.

When faced with a complaint from a vendor, the three most important steps are 1) to listen and let the person explain his/her concern. Show you understand the person's point while remaining neutral and not offering any opinion on whether or not another vendor is "guilty." 2) Tell the vendor what you will do. It may be simply thinking about it or researching something. Or it may be initiating a more formal process. Don't promise anything that you cannot do. 3) After a week or two, report back to the vendor on what you did and any action you took.

If your market does not have written policies, consider drafting policies or protocols so that everyone responds consistently and with the confidence and backing of the entire market management and board.

Your policy should include:

- brief statement about why this matters
- step by step protocols for vendors and staff;
- description of types of documentation needed;
- any fees that may be charged;
- expectations around timing, when to expect a response;
- if there is an appeal option, what is the process;
- clear consequences; and
- assurances about confidentiality.

The Portland Farmers Market has an excellent example in their 2016 Vendor Handbook. They are a large market organization able to implement strong policies. Smaller markets will need to adjust what their policies to what they can reasonably manage.

Portland Farmers Market - 2016 Vendor Handbook

<http://www.portlandfarmersmarket.org/wp-content/uploads/2016/03/Vendor-Handbook-2016-1.pdf>

Protocols for vendor grievances and product challenges

PFM has created protocols and procedures that allow vendors to lodge complaints against other vendors whom they believe to be out of compliance with market rules and policies. This helps PFM regulate food safety, products sold and operational safety.

To file a vendor concern or product challenge, use the [Vendor Concern Form](#) or [Vendor Challenge Form](#) in the Appendices section.

Grievance procedures

1. Complaints or problems should be directed to the market managers in a timely manner that is not disruptive to the market.
2. Vendors who have concerns regarding other vendor compliance, market staff, safety, or policies should complete a vendor concern form. Forms will be available at the managers booth. The Executive Director and Market Managers review each concern form and the concerned vendor will receive a specific written response within two weeks.
3. A vendor may appeal any decision concerning violation of these rules within 30 days. An appeal must be presented in writing to the Executive Director. A decision by the Executive Director after informing the PFM Board shall be issued within 30 days of receipt and constitute a final and binding decision of any appeal.

Product challenge

1. Product challenges may be made for misrepresentation of product by a vendor. Vendors can submit a written product challenge form when they believe another vendor is misrepresenting their product.
2. A product challenges must be signed by the person bringing the challenge and preferably be supported by physical evidence of the offense. The product challenge must be made within a week of observing the violation. Challenges alleging wrongdoings on past occasions will not be accepted.
3. There is a \$50 filing fee, which can be shared by a group of vendors. This fee is returned to the challenger if the claim is verified.
4. The vendor receiving the product challenge must respond to the challenge in writing. Failure to admit or deny a challenge may result in a determination that the challenge is valid.
5. The Market Managers will conduct a farm site visit in a timely manner to make a determination on the product challenge. If PFM deems it necessary, a third party farm inspector will be employed.
6. Product challenge forms are available at the managers booth. Because of their sensitive nature, they must be returned directly to the Market Manager or Executive Director.
7. If the vendor is found in violation, vendor may be fined, placed on probation, suspended, or evicted from the market at the discretion of the Executive Director.

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Additional Tools

Additional tools that markets use to promote integrity include:

- Requiring vendors keep and submit load sheets;
- Using smartphones to take photos; and

- Using “Secret Shoppers” to check that behaviors and booth displays are consistent even when market staff or volunteers are not present.

Farm Visits and Inspections

Forty-four percent of markets surveyed in 2014 said that their market policies or application process require a farm audit, farm visit, farm inspection, or third-party verification for farm vendors. However, there are significant challenges to implementing these policies, especially around doing farm visits and inspections.

6. From your experience, what are the BIGGEST CHALLENGES with ensuring your “market integrity” meaning farms are growing what they sell, accurately representing themselves and having accurate signage? Written comments were grouped in to themes.

Biggest challenges to ensuring market integrity	Frequency	Percentage
Not enough time to visit farms	11	33%
Concerns about having enough knowledge to conduct a thorough farm visit	7	21%
Not enough money to visit farms	5	15%
It is hard to visit farms (more generally)	5	15%
Communication barriers	3	9%
Concerns about relationship with vendors	2	6%
Total	33	100%

Source: “Current Farmers Market “Farm Inspection” Practices in WA Survey Results” C. Donovan, July 2014.

In general, farm vendors love it whenever a market manager takes the time to come see their farm, meet their family, and they can show off their products. Nevertheless, it’s important to distinguish between a more casual “farm visit” and an official “farm inspection.”

Feature	“Farm Visit”	“Farm Inspection”
Purpose	<ul style="list-style-type: none"> ▪ To get to know farmers; build relationship with farm, and products. ▪ To better understand farm operation. ▪ Public Relations 	<ul style="list-style-type: none"> ▪ To verify information provided by vendor. ▪ To better understand farm operation. ▪ Maybe routine inspection or in response to a concern.
Preparation	Minimal	Significant
Tone	Casual	Formal and objective
Protocol	Free form	Semi-structured
Follow up	Thank you and share photos (as appropriate); feature in blog post	Written report with outcomes; and thank you.

or other promotions

Tricky features of farm inspections to be aware of:

- Farming operations are usually complicated, involving multiple owners, parcels, products, and markets.
- In Washington, there are various microclimates even within the same region so “seasonality” needs to be evaluated in the local context.
- Assessing yields is problematic unless you bring in an agro-economic expert.
- High density or intensive production methods yield far more significant amounts of product on a smaller land base.

Best Practices for Farm Inspections

- 1 Know your market policies. Is there a written protocol? What is the reason for your inspection (e.g., routine practice? random selection? in response to an issue? new vendor?).
- 2 Inventory and take photos of farm vendor’s booth and products being sold at the market immediately preceding your farm inspection.
- 3 Notice: Try to balance respect for their busy schedule and your need for a timely inspection.
 - Give the farmer a minimum of 24 hours advance notice. If appropriate, let the farmer know you are coming and give them a couple of options in terms of the time and/or day.
 - Let the farmer know the purpose of the visit and what you expect to be able to see, including any records, production sites, greenhouses, processing, dry storage, and cold storage.
 - Also, let the farmer know who will be coming.
- 4 Think about your timing. Farms are typically very dynamic and change throughout the season. If you can only afford one visit, think about what is most important to witness: seeds, seedlings, harvest-ready products, stored goods?
- 5 Documentation. Use the same form or series of questions for each farm inspection to show that you are treating each vendor in the same, fair way. If you take photos, be sure to add captions and dates when you file them.
- 6 It’s simple, but be sure to thank the farmer and whomever hosted you for their time and let them know what the next steps in your process are. Then be sure to follow through in order to enhance their confidence in the process and outcomes.

⑦ Keep all farm information secure, well organized, and confidential. Except in pleasant generalities, do not talk about other farms to other vendors or to staff, especially in a public space like the market.

The Moscow Farmers Market compiles a slide show with all the photos they took visiting farms and shows it at their annual vendor meeting. Since people rarely have a chance to visit other farms, seeing the photos can dispel some of the mystery and speculation.

Evolving Model for Washington State

Fortunately, a team is working to bring a Market Integrity Program to Washington State with support from the USDA Federal State Marketing Improvement Program. It will be voluntary and driven from the bottom-up. The goal is to ensure public trust in all direct farm sales at Washington State farmers markets. Benefits include:

- ✓ Clear and fair standards for all farmers and markets
- ✓ Professionalization of farmers markets
- ✓ Deterrence against possible fraud or misrepresentation
- ✓ More efficient and productive farm visits
- ✓ Consistent response to questions and enforcement
- ✓ Marketing distinction for farmers and farmers markets
- ✓ Building confidence and reducing risk of negative media that hurts public trust

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