

Artisan Processing and Food Safety Regulation in Michigan: Preliminary Summary of Research Findings from Interview Data

Jenifer Buckley¹

Michigan State University | Department of Community, Agriculture, Recreation, & Resource Studies
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1. Introduction

This report presents preliminary findings of the first phase of a qualitative study that aims to improve the regulatory process for Michigan's artisan processors—that is, processors who use handcrafting methods and who are closely involved throughout the production process. In this phase, interviews were conducted with artisans and food safety inspectors throughout Michigan. The report describes research methods, summarizes preliminary findings, presents the next steps in the study, and discusses implications.²

An advisory committee has advised on participant selection, provided feedback on interview questions, and advised on the next steps in the project. Many thanks go to committee members, who represent:

- Producers: Sue Spagnuolo, Cheesemaker, Greenbush Farms, St. Johns, Mich.
Ron Steiner, Director, The Starting Block Incubator Kitchen, Hart, Mich.
- Regulators: Kevin Besey, Director, Food and Dairy Division, Michigan Department of Agriculture and Rural Development (MDARD)
Siobhan Kent, Department Analyst, Food Safety Planning and Response, MDARD
- Food businesses: Natasha Lantz, Community Liaison, Marquette Food Cooperative, Marquette, Mich.

2. Research Methods

Participant Selection

Artisans (n = 24). The study focuses on cheese, bread, and jam production, three types of artisanship that are well-represented in Michigan. Artisans were identified through 1) internet searches for self-described handcraft producers of these products; 2) “snowball sampling”—that is, processors contacted early in the project recommended other processors; and 3) the assistance of the following people and organizations: Matt Birbeck of the MSU Product Center, Jim Sluyter of the Michigan Land Use Institute, Cathy Martin of MDARD, the Michigan Cheese Makers Cooperative, Wendy Wieland of Northern Lakes Economic Alliance, and members of the project advisory committee (see above).

Identities of interview participants and their businesses, and identifying details, are confidential and are not shared with the advisory committee or others. Any details on production volume, time in business, etc., are aggregated.

Interviews were conducted with cheesemakers (n = 10), bread makers (n = 8), and jam producers (n = 6, including staff of 2 incubator kitchens whose clients produce jam). Nearly all had been licensed for at least 2 years.

Inspectors (n = 9). Contact with inspectors was facilitated by MDARD Food and Dairy Division supervisors. Artisan producers represent a small proportion of the facilities that inspectors evaluate, and supervisors identified inspectors who are familiar with artisan facilities.

The inspectors interviewed were from the Food Section (n = 6) and the Dairy Section (n = 3) of the Food and Dairy Division.

¹ Contact: 480 Wilson Rd., room 131, East Lansing, MI 48824, 517/355-5962, jbuckley@msu.edu, www.msu.edu/~jbuckley

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Assumptions

The study began with the working assumption that artisans experience regulatory requirements as barriers, and for two reasons: 1) Regulatory requirements impose a large-scale, more industrial style of production on handcraft producers; and 2) Requirements are costly, favoring producers who achieve economies of scale.

Data Collection and Analysis

Semi-structured interviews lasted approximately 30 to 90 minutes (average approximately 60 minutes). Notes and transcripts were coded with NVivo, a qualitative data analysis program, to identify key themes and concepts.

3. Findings

Although the findings show some evidence that artisans experience requirements as barriers, their experience of regulatory processes appears to be more complex.

The Producer-Inspector Relationship

A key finding is that the rapport formed with inspectors significantly impacts the regulatory process for artisans. In some cases, a positive rapport facilitates creative problem solving as producers and inspectors work together to identify ways for producers to comply with rules while pursuing their own styles of production.

In the first several interviews, artisans and inspectors were asked about the specific regulatory requirements that affect producers, and not about the rapport between producers and inspectors. Without being asked, however, individuals in both groups described the producer-inspector dynamic and the importance of this relationship. In fact, when producers were asked their opinions about regulatory requirements, some responded by instead describing the positive effect of this relationship on their ability to understand and comply with requirements.

Not all participants share the views summarized here. Many described negative experiences and voiced a variety of criticisms. Nevertheless, the following provides a fairly representative snapshot of remarks. These findings will be shaped into recommendations for both groups.

Producers advise other producers to build positive relationships with inspectors and to:

- Convey a collegial, forthright attitude, such as “Our goal is to work together to have a safe, quality product.”
- Recognize and accept inspectors’ authority and expertise.
- Inform themselves about regulations and plan ahead.
- Persist with plans and seek collaboration with inspectors in developing solutions to issues that arise.
- Make judicious decisions about which disagreements to challenge. As one said, “Go along with the little stuff. That way, when the inspector asks for the big stuff, it’s easier to make it into smaller steps.”
- Ask questions and listen. “Listen, listen, listen.”

Inspectors who build positive relationships:

- Learn about individual operations.
- Remain non-judgmental and receptive to production practices with which they are not familiar.
- Are patient and explain the rationale for requirements.
- Give producers advance notice of upcoming regulatory changes.
- Have a supportive attitude and a willingness to identify different ways for producers to comply with regulations: “Every wild hair thing I’ve brought to [my inspector], she’s said, ‘Okay, let me see.’”
- Are straightforward and direct in communication.

Negative relationships:

- Producers who described negative relationships often described inspectors’ “need to be in control and not taking time to address a problem,” as one expressed it.
- Both inspectors and producers advise other producers not to adopt an antagonistic attitude or “think they have nothing more to learn” about food safety or, for that matter, about their own operations.
- Producers advise other producers not to see inspectors as enemies who are “out to get them.”

Regulatory Requirements

Artisans were asked how regulations affected their operations and whether they would like to see changes in regulatory requirements. Most, though not all, initially responded that they have found ways of doing what they want to within legal requirements, and that regulations do not impede them: “After awhile, you’re sort of on cruise control.” However, during conversation, producers indicated they felt that some requirements were in fact burdensome in the following ways.

Barriers cited by producers	Examples cited by producers
Inconsistent enforcement of requirements	<ul style="list-style-type: none"> Some inspectors allow the use of wicker baskets and linen in bread making, and others do not. Different inspectors require different milk sampling methods.
Requirements that appear impractical or not sensible for some facilities	<ul style="list-style-type: none"> The wording and amount of detail required by labeling rules. Some inspectors interpret dairy law to require bulk tanks for milk storage, yet not all cheesemakers store milk. Some use milk immediately on receiving it or milking.
Requirements that are costly	<ul style="list-style-type: none"> Nutritional analysis of products There are relatively few approved laboratories for testing milk, and driving samples to labs is costly.
Requirements that appear to be vague	<ul style="list-style-type: none"> Labeling requirements Confusion about the jurisdictional responsibilities of MDARD and other agencies

Resources Needed for Artisans

Artisans value inspectors as resources providing technical support and advice. Many, though not all, inspectors see their roles as trainers and would like to offer this assistance to producers. However, their workloads may not permit them to spend as much time with producers as either party may wish they could spend. Participants were asked about artisans’ resource needs:

- Education. Ongoing educational opportunities for current and prospective processors, including written and online materials. Cheesemakers cited the importance of MSU’s cheesemaking course and an interest in seeing it expanded and offered more often.³
- Networking and improved communication among artisans, MDARD, producer associations, and MSU resources such as the Product Center, Extension, and the Kellogg Biological Station.
- Resources on equipment and (for cheesemakers) testing, such as more approved laboratories and more accessible information about approved laboratories and small processor equipment.

4. Next Steps and Implications

Focus groups in late winter 2013 will provide opportunities for producers and MDARD staff to network (a key need to emerge from the interviews) and to discuss the study’s findings and implications.

Project outreach will include presentations and articles for both academic and practitioner audiences—producers and MDARD as well as other agencies that regulate small and medium sized processors.

Regulations must be understood not only in terms of literal requirements but also in the relationship formed between producers and inspectors. Much scholarly and practical discussion of food safety regulation focuses on specific requirements. Although the specific substance of requirements is undeniably important, this study suggests that good producer-inspector rapports can facilitate the exploration of different ways for producers to meet specific requirements and improve compliance.

There has been little investigation of the producer-inspector dynamic, and in the next phase of this research, inspectors will be shadowed on inspections of artisan cheese and bread facilities in order to observe this dynamic in action. This next phase is funded by a National Science Foundation grant.

³ Cheesemakers particularly cited Dr. John Partridge (MSU Department of Food Science and Human Nutrition), Mat Haan (Kellogg Biological Station), and the Vermont Institute for Artisan Cheese as valuable resources.