



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
File:

Committee on Health

S.B. 2332, S.D. 1, RELATING TO AGRICULTURE

Testimony of Loretta J. Fuddy, A.C.S.W., M.P.H.
Director of Health

February 27, 2012
2:45 p.m.

1 **Department's Position:** The Department of Health opposes this bill in its current form. We
2 suggest some amendments that, if adopted, would allow us to support this measure.

3 **Fiscal Implications:** This bill has substantial fiscal implications for the department. DOH staff
4 will be required to review and evaluate non-municipal water treatment equipment for proper
5 construction, engineering, installation, and life long maintenance to ensure a consistent and safe supply
6 of potable water.

7 **Purpose and Justification:** We oppose Section 2; §328- Honey producers without access to
8 municipal water; exemption., as it includes recommendations that are costly to implement for both the
9 honey producers and the department. Section 2 of this bill will be very costly for all honey producers,
10 but especially for the small producers and defeats the purpose of this bill. The reason for the exemption
11 to a municipal water source is the high cost of installing municipal water lines in rural areas, or the
12 construction of potable water tanks to hold trucked-in water from a municipal water supply. Reverse
13 osmosis water treatment units that meet or exceed existing state water quality standards are costly and

1 require a high degree of lifetime maintenance to ensure proper functioning as an alternative water
2 treatment system.

3 Testing of non-municipal water supplies to ensure existing State and Federal standards for
4 potable water are exceeded or met will be extremely cost prohibitive. To complete the monthly battery
5 of tests for bacteria, heavy metals, pesticides, and other trace contaminants would cost the home-based
6 honey producers thousands of dollars.

7 As currently written, the department is not opposed to the increase in the gallons of honey
8 produced without permit or the opportunity for honey producers to wholesale their product to retailers.
9 However we find Section 3, **§328-79 Home-base agricultural producers of honey; exemption.**
10 provides inadequate safeguards for food safety. The department would support the passage of this
11 measure if Section 2 were deleted and the following amendments are incorporated into Section 3:

12 §321-79 (3) (F) should be changed to: **The statement, “This product was not produced in a**
13 **Department of Health inspected facility and may place you at greater risk of contracting a**
14 **food-borne illness or being exposed to environmental contaminants.” in clear and**
15 **conspicuous print.** And the following language is added to §321-79:

16 (4) **Attends a department of health approved food safety workshop and pass the food**
17 **safety certification exam; and**

18 (5) **Maintain records of honey production volume, and honey product distribution for a**
19 **period of not less than two years, and makes these records available to the department**
20 **upon request.**

21 Thank you for the opportunity to testify.