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HOW TO MAKE A FARMERS' MARKET

The Legal Structure Behind Local Food

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Farmers' markets are gaining influence as business models for the local food movement. The number of farmers' markets is steadily growing in the United States as more people become personally invested in getting food from the farm to their plates. The number of farmers' markets in the United States has doubled in the last ten years from 3,137 in 2002 to 7,864.¹ Farmers' markets have become popular with customers for a variety of social and economic reasons. A farmers' market allows customers to interact with farmers and develop valuable personal relationships. When shopping at a farmers' market, the customer learns who has the best squash and zucchini and which farmers allow customers to sample the goods before they buy. These relationships lead to opportunities for customers to visit the farm and get a firsthand look at the amount of labor required to produce a crop. Buying directly from the farmer means that the customer has access to fresh, seasonal produce and that the customer can ask about how vegetables are grown and meat is produced. Also, as farmers' markets continue to proliferate and develop their customer bases, many markets have begun accepting Supplemental Nutrition Assistance Program (SNAP) benefits. The SNAP payment option not only benefits the farmers by increasing sales but also allows low-income members of the community to enjoy fresh, nutritious, local produce.² People enjoy the community aspect; visiting the market allows them to catch up with friends and neighbors whom they might not normally get to see during the workweek.

This trend toward greater intimacy between consumers and agriculture shows no sign of abating, and it is an excellent reason for farmers to organize more markets. Farmers' markets are the ideal way to deliver both the good food and the emotional satisfaction that consumers get when they form stronger bonds with the agricultural community. But a farmers' market is still a business. As a distinct legal entity, a farmers' market creates economic opportunities and efficiencies that very few individual farmers can afford on their own. Market organizers assume a duty to give farmers direct access to a specific type of conscientious consumer, increase farm revenue by eliminating packing and shipping costs, create customer loyalty and community engagement in agriculture, and handle the market's logistics—setting up the market space, obtaining the necessary permits, and handling parking problems. Thus the or-

¹Agriculture Marketing Service, U.S. Department of Agriculture, Farmers Market Growth: 1994–2012 (Aug. 3, 2012), <http://1.usa.gov/108Bm0u>.

²Oran B. Hesterman, *Double Up Food Bucks: How Advocates Can Help Grow a Healthy, Sustainable Food System*, 46 CLEARINGHOUSE REVIEW 276 (Sept.–Oct. 2012); Jill Krueger, *The Farm Bill as a Resource for Strengthening Food Systems*, *id.* at 218, 219–20.

ganizers help farmers reach new, enthusiastic customers and allow customers to enjoy their shopping experience.

A market operator can be judged by objective criteria. A market can justify its expense only if it performs well, as measured by the number of customers it draws, its success in facilitating city permits, or the success of the public relations and marketing campaigns it runs on behalf of its farmer members.

For the public health advocate, farmers' markets can be powerful tools for social justice. The proliferation of farmers' markets has virtually no downside. Farmers' markets fill a vital gap in our food system between rural producers and increasingly curious consumers in search of fresh, nutrient-dense food. A well-managed market can and should be a tool of economic development for rural, producer regions and downtown population centers. Increased interaction between consumers and the people who grow their food creates opportunities for a broad range of enriching educational experiences. Markets can be a compelling source of foot traffic to commercial districts that have been left behind by the popularity of the big box store shopping experience. Perhaps most important, the variety of healthy foods typically sold at markets offer appealing alternatives to the average American diet. Any individual, government, or organization seeking to promote such goods should consider forming a local farmers' market.

None of these goals, however, can be achieved without a legal structure that grows human and financial capital and provides for the executive leadership of the market. The groundwork for success in these areas can be laid in the early stages of planning and forming a market. We explain the different legal structures that market organizers can use to create and regulate well-run, efficient farmers' markets.

The Nonprofit Corporation

The nonprofit structure seems like the natural choice for a corporate entity to represent groups of farmers coming together each week to sell their produce. In the farmers' market context, the nonprofit entity exists so that farmers and the community can become enriched by the shopping, socializing, and eating that go on within the market. Note that the enrichment points outward, toward a group of public beneficiaries, not inward toward a group of private shareholders.

Do not confuse the lack of profit motive, however, with a lack of managerial responsibility. Nonprofit corporations are, in fact, corporations that need to be operated in accordance with state law and the federal tax code. A nonprofit corporation is formed by filing, with the state, articles of incorporation declaring the purpose of the organization. Next the market must have carefully drafted bylaws to serve as the governing document for the organization. Examples of farmers' market bylaws can be found on the Farmers Market Coalition website.³ Many states also have sample bylaws.⁴ These being basic templates, market founders with experience may want to get more creative with their bylaws.

The goals of the bylaws can be as unique as the market. The bylaws should identify the organization as it was named in the articles of incorporation. They should also establish the purpose of the organization, the shape of the board of directors, and the organization's methods of operation. If the founders want to create a designated mix of healthy ingredients, or mandate that all farmers' market members must accept SNAP benefits, they may do so here. For example, the bylaws may state that the market allows only raw agricultural commodities to be sold, or the bylaws may state that all products must meet specific nutritional requirements. The bylaws of the Crescent City

³Farmers Market Coalition, Resource Library (2008), <http://bit.ly/XUXs6x>.

⁴See GLENICE PEARSON, GUIDELINES FOR SOUTH CAROLINA NONPROFIT CHARITABLE ORGANIZATIONS app. E (Nov. 2003), <http://1.usa.gov/107Gfa5>; Vermont Secretary of State, Model Bylaws (2004), <http://bit.ly/16EpMgD>. If a state's sample bylaws or bylaw guidelines are not available from its secretary of state, they are often available from the state bar association (see NANCY E. FORBES, MASSACHUSETTS STATE BAR ASSOCIATION, GUIDEBOOK FOR BOARDS OF DIRECTORS OF MASSACHUSETTS NONPROFITS 3-17 (Nov. 2010) (pages 3-17 available at <http://bit.ly/WxL7Fs>)).

Farmers Market in New Orleans, Louisiana, have an exhaustive list of the specific products that may be sold in the market.⁵

Bylaws can also be used to establish a particular value for the market. A market that wants to protect animal rights can state in its bylaws that any product derived from an animal may not be sold in the market. Alternatively a market that wants to promote healthy eating can establish minimum nutritional requirements for all goods sold. Bylaws can also prevent undercutting by forbidding vendors from selling below cost or giving away items. By getting creative with bylaws, farmers' markets can use the complexity of non-profit corporate structure as an asset for the market instead of a statutory burden.

Any nonprofit organization faces its toughest administrative challenge when seeking tax-exempt status from the Internal Revenue Service (IRS).⁶ Section 501(c) of the Internal Revenue Code provides tax exemptions for organizations with many different purposes, and a typical farmers' market could be established under several different sections of the code.

Agricultural and horticultural organizations connected to functions such as raising livestock, cultivating land, raising crops, and similar agricultural pursuits are 501(c)(5) organizations. Many organizations filed under Section 501(c)(5) of the Internal Revenue Code are designed to encourage—by using awards and prizes generated from entry fees, ticket sales, and donations—the development of better methods of breeding and farming.⁷ More generally, these organizations may conduct activities that promote various co-

operative agricultural, horticultural, and civic activities among rural residents.⁸ Although some farmers' markets may conceivably fit these parameters, the limitations of 501(c)(5) seem to rule out the most commercially aggressive activities of a typical farmers' market. As a further disincentive to this particular exemption, contributions made to 501(c)(5) organizations are not deductible as charitable contributions on a donor's federal income tax return as they would be for a 501(c)(3) organization.⁹ They are, however, deductible as ordinary business expenses if made to further a necessary goal of a taxpayer's trade or business.¹⁰

Nonprofit organizations whose activities are directed toward marketing, selling, and commerce promotion often consider the exemption at Section 501(c)(6) of the Internal Revenue Code. This business league exemption is appropriate for associations of persons having common business interests of a kind not ordinarily conducted for profit.¹¹ A common business interest of all members must be established by the exemption application.¹² These are the kinds of organizations that may file under Section 501(c)(6):

- Organizations that promote higher business standards and better business methods through uniformity and cooperation by members of a retail merchants association;
- Organizations that establish and maintain the integrity of a local commercial market; and
- Organizations that encourage an entire industry's use of goods and services.¹³

⁵Crescent City Farmers Market, Market Rules and Regulations (n.d.), <http://bit.ly/143IDmG>.

⁶Timothy R. Tarvin, *Preserving Tax Exempt Status for Your Nonprofit Client*, 2010 ARKANSAS LAW NOTES 121 (2010), <http://bit.ly/16Ernmz>.

⁷Internal Revenue Service, U.S. Department of the Treasury, Publication 557, Tax-Exempt Status for Your Organization 52 (Oct. 2011), <http://1.usa.gov/WyAi8>.

⁸*Id.*

⁹I.R.C. § 170 (2013).

¹⁰*Id.* § 162.

¹¹Internal Revenue Service, *supra* note 7, at 53.

¹²*Id.*

¹³*Id.*

The activities of such organizations are appropriate for a typical farmers' market.

Without question, the most sought-after exemption is Section 501(c)(3) of the Internal Revenue Code. Because contributions made to organizations with this status entitle donors to claim tax exemption for donations, 501(c)(3) status facilitates a broader array of funding possibilities for the applying organization. Major grant programs, such as the Community Food Projects Competitive Grants Program, contribute only to organizations with 501(c)(3) status.¹⁴

The exemption pursuant to Section 501(c)(3) of the Internal Revenue Code applies to organizations that are operated exclusively for religious, charitable, scientific, literary, or educational purposes or for the prevention of cruelty to animals. Farmers' markets do not fit perfectly into any of these categories. Nevertheless, farmers' markets that apply for tax-exempt status under this exemption must prove to the IRS that they fulfill one of these purposes. For example, a market may have an educational purpose if it offers workshops on cooking with local foods in season or holds classes for farmers about marketing their products. The organization has the burden of proof in its IRS Form 1023, Application for Recognition of Exemption, that it has been organized for one or more of these qualified purposes.¹⁵ If an organization cannot persuasively argue that its activities warrant exemption, the IRS may elect to qualify the market with the 501(c)(5) or (c)(6) designations; either would make for a viable market, but both are less than optimal classifications.

The IRS prohibits a 501(c)(3) organization from being organized or operated

for the benefit of private interests, and no part of a 501(c)(3) organization's net earnings may inure to the benefit of any private shareholder or individual.¹⁶ A Form 1023 application therefore should emphasize the public good that the market will accomplish instead of the economic gains to be made by the participating farmers.¹⁷ A crucial point that the applicant should stress is the charitable or educational benefits that a market brings to a local community. An applicant may argue that a market will educate local consumers about local agriculture, buying locally, healthy eating, or selling only goods whose production is certified by a third party as having been kind to animals. A very popular justification may also be the market's commitment to alleviating obesity by facilitating healthy eating. A bylaw may require that a certain percentage of the market's goods are donated to needy families, homeless shelters, or other neighbors in need.

The Board of Directors and the Manager

Once a farmers' market achieves tax-exempt status, the market needs a board of directors. The board is responsible for the fiscal health of the organization. Board membership demands a good deal of time and commitment, and board composition is critical to the success of a nonprofit market. Several attributes should be considered when selecting members. Create a well-balanced board by choosing individuals with unique talents or specialties to bring to the organization. They should be experienced and well respected in fields useful to the management of the nonprofit market. For example, accountants are useful board members because they can oversee

¹⁴National Institute of Food and Agriculture, U.S. Department of Agriculture, Hunger and Food Security: Community Food Projects Competitive Grants (March 18, 2009), <http://1.usa.gov/115moY2>.

¹⁵Internal Revenue Service, U.S. Department of the Treasury, Notice 1382, Changes for Form 1023, Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code (rev. Oct. 2012), <http://1.usa.gov/11fNnUI>.

¹⁶Internal Revenue Service, *supra* note 7, at 24.

¹⁷Internal Revenue Service data support the need to make this distinction clearly in the exemption application. The IRS's Exempt Organizations Business Master File lists 158 applicant organizations with the words "farmers market" in their names (Internal Revenue Service, U.S. Department of the Treasury, SOI Tax Stats—Exempt Organizations Business Master File Extract (EO BMF) (March 11, 2013), <http://1.usa.gov/14z5J3X>). Of those organizations, 54 percent of applicants using the phrase "farmers market" did not achieve 501(c)(3) status. Seventy-three farmers' markets (or 46 percent) achieved 501(c)(3) status, thirty-two were assigned 501(c)(4) status, fifteen were assigned 501(c)(5) status, and thirty-eight became 501(c)(6) organizations (*id.*).

the bookkeeping and ensure the financial health of the market. Lawyers are an asset to a board because they can identify potential risks for the market. Having legal services lawyers on the board may be particularly beneficial for markets in low-income neighborhoods. Legal services lawyers can use their knowledge of the community to advise the market on how to encourage residents to participate in the market. Legal services lawyers can advise farmers' markets about SNAP benefit eligibility. The board should also have individuals dedicated to the mission of the organization. Such individuals are enthusiastic and effective fund-raisers. Board members must have a long-term vision for the farmers' market not only to make sure that the market is running successfully now but also to think creatively about how to ensure that the market remains successful.¹⁸

Many states provide guidance for selecting a board of directors and understanding the responsibilities associated with serving on a board. California requires that all activities and affairs of the organization be conducted under the direction of the board of directors.¹⁹ Massachusetts requires that members of a board of directors act in good faith and in the best interest of the organization.²⁰

Once the board of directors is established, the board hires a market manager to run the day-to-day operation of the market. The manager publicizes and promotes the market, gets the state and local permits, clears the plaza of tables at the close of the market day, or procures anything else the market and the farmers need in order to make a sale. This is a job like any other—the board should set out the obligations of the position, set the right performance expectation and sala-

ry, and hold the manager accountable for fulfilling its expectations.

Markets should support themselves by collecting vendor fees from farmers participating in the market. These fees are used to cover costs associated with renting the site, city permits, the market manager's salary, and other expenses. Nonprofit markets have devised ingenious methods for determining appropriate market. For example, the Berkeley Springs Market in West Virginia determines the fee on the basis of the size of the vendor's booth, location in the market, and drive-in accessibility.²¹

The challenges for a nonprofit farmers' market primarily concern the collection of revenues. To preserve the market's tax-exempt status, market managers and boards of directors should familiarize themselves with IRS Publication 557.²² Some forms of revenue may jeopardize the privilege of tax exemption if the nonprofit organization is operated carelessly. If the organization has, from another source, income that is not related to the purpose that is the basis for the organization's tax exemption, then the organization must file an additional tax return for the unrelated business income. Guidance for how to manage unrelated business income can be found in IRS Publication 598.²³ However they are derived, the economic resources of a nonprofit farmers' market should flow in some way back to its farmer-beneficiaries. What is key to remember is that in a nonprofit corporate structure this is a legal obligation as well as a moral one.

The Fayetteville Farmers Market in Fayetteville, Arkansas, exemplifies affording economic opportunity for participating farmers and making an impact on the

¹⁸W. ASTOR KIRK, BOARD MEMBERS: GOVERNING ROLES AND RESPONSIBILITIES 127 (2007).

¹⁹CAL. CORP. CODE § 5210 (2013).

²⁰MASS. GEN. LAWS ch. 180, § 6C (LexisNexis 2013).

²¹Letter from Berkeley Springs Farmers Market Committee to Interested Farmers Market Producers 3 (Jan. 16, 2013), <http://bit.ly/XUyUKN>.

²²Internal Revenue Service, *supra* note 7.

²³Internal Revenue Service, U.S. Department of the Treasury, Publication 598, Tax on Unrelated Business Income of Exempt Organizations (March 2012), <http://1.usa.gov/XUxVdD>.

community.²⁴ The market's mission is to have access to healthy local food and increase small-scale, sustainable agriculture. Participating farmers pay a nominal yearly membership fee and a small commission each participating day. The commission is based on the farmer's daily sales. The market uses revenues for public awareness and education. The market educates vendors on food safety, state laws and regulations, and food handling. The market offers classes to the public on the benefits of a local food system, economic development, healthy eating, nutrition, and cooking with recipes using local foods. These classes create new customers for the market. The market's board of directors sets forth the market's goals and decides what educational programs to be offered. Participating farmers elect the board and trust the board to execute the market's goals. The board is accessible to market members, who participate in decision making at biannual board meetings. The Fayetteville market's board has been very successful—last year's sales increased by 25 percent.²⁵

The Privately Owned Market

A privately owned farmers' market is the most centralized route to local food. A market operated by a for-profit business entity could be owned by any individual looking to take advantage of the economic opportunity presented by local food. A privately owned market is free to respond quickly to the needs of market customers and vendors in order to create a market atmosphere that is conducive to shopping and socializing. The destiny of the organization is not run by a committee or by a board of directors but by a single entity with the executive authority to mandate the way business is conducted. Although this may seem autocratic, anyone with experience in leadership by committee understands that this can definitely streamline a market's decision making.

In a privately owned farmers' market the contract is the central element. Each vendor must be contractually bound to the market owner with terms that cover the products to be sold, the prices charged, the duration of the agreement, the duties of the market owner, or any other term ordinarily included in a service contract. Although this may expedite market leadership, it puts vendors at a disadvantage. Vendors are not members of a privately run market and have no role in its governance. This leaves the vendors with little procedural recourse to fire a lousy manager or to change low-traffic stalls unless the contract covers such problems.

Establishing a private market can nevertheless enrich the market owner and the farmer vendors. Owners can still profit through vendor participation fees, and these fees are justified by the planning, marketing, and advertising efforts of the private market manager. In order for this structure to remain profitable the owner would work to increase customer participation in the market. The owner would enlist as many talented and diverse vendors as possible. Successful management by an owner inherently invested in the market's growth and diverse offerings would in turn increase the individual farmers' profits.

The best legal structure to consider when starting a private farmers' market is the limited liability corporation. The advantage of the limited liability corporation is that the private assets of the owner will be protected, taxes are paid at the individual level, and this structure has fewer statutory management burdens.²⁶

The Cooperative Organization

Another legal structure available to individuals interested in starting a farmers' market is the cooperative—a business organization owned by the participating members. The cooperative's goal is to maximize profit for its members. Com-

²⁴Fayetteville Farmers Market (n.d.), <http://bit.ly/XUMhgb>.

²⁵Interview by Erin Kee with Lori Boatright, General Manager, Fayetteville Farmers Market, in Fayetteville, Arkansas (Jan. 28, 2013) (notes on file with Erin Kee).

²⁶One example of a privately owned market is the Soda City Market in Cola, South Carolina (see Soda City Market (n.d.), <http://bit.ly/YWo9Ui>).

mon to all cooperatives, the governing principle is one member, one vote.²⁷ This principle is codified in many state statutes. For instance, New York provides that each member of a cooperative shall be entitled to only one vote.²⁸ Participating members vote on all the major business decisions of the company and select the key executives to run the organization—this sense of community responsibility ingrained in the DNA of the organization being one of the great benefits of organizing a farmers' market under a cooperative structure. This can be an extremely important marketing advantage for any farmers' market.

Unlike other business corporations that distribute profits to investors based on the amount of their investments, cooperatives distribute any excess income equally among the members. The benefit here is that this money is taxed only once if the income's source and distribution methods are cooperative in nature.²⁹ Farmer cooperatives are also allowed to deduct the dividends that are paid on capital stock and distributions of non-cooperative earnings to patrons based on their patronage. Farmer cooperatives are statutorily defined for tax exemption purposes.³⁰

Two common business models are used within the cooperative framework to operate farmers' markets in the United States. The first model is a cooperative entirely owned by participating farmers. This means that each farmer member takes part in all the business decisions in running the market. For example, the members can vote on whom to hire as a market manager or where to locate the market. The benefit of this structure

is that each farmer can ensure that the market meets each farmer's needs.

However, voting on too many issues in a purely cooperative structure can become cumbersome for markets with a high number of farmer members. Farmers are an independent-minded lot, and getting them to agree on nitty-gritty details of market operation can be challenging. The bylaws of the cooperative should strike a balance between creating a sense of community through democratic decision making and establishing executive leadership that can decide without constant resort to committees. Because farmers are "widely scattered and inured to habits of individualism," they have received exemptions from many antitrust laws.³¹ Farmers organized into cooperatives have received these exemptions because the farmers' relationship with the community and their sense of social responsibility led legislatures to believe that they would not abuse the benefits of collective bargaining.³² The Capper-Volstead Act exempts cooperatives composed entirely of pure-producer members from antitrust laws. The members of the cooperative must be engaged in production and cannot simply process agriculture products. The Act states that these individuals may have marketing agencies in common and can make the necessary contracts and agreements to carry out that purpose.³³ States have also adopted similar protections for farmers. New York provides that any cooperative of farmers and their contracts, agreements, and arrangements are not subject to the law prohibiting monopolies.³⁴ A farmers' market cooperative composed entirely of producers would be able to take advantage of these protections.

²⁷U.S. Department of Agriculture, *Farmers, Cooperatives, and USDA: A History of Agricultural Cooperative Service*, AGRICULTURE INFORMATION BULLETIN No. 621 (1991).

²⁸N.Y. COOP. CORP. LAW § 44 (2013).

²⁹DONALD A. FREDERICK, *INCOME TAX TREATMENT OF COOPERATIVES: BACKGROUND* (2005), <http://1.usa.gov/ZNBwGV>.

³⁰26 U.S.C. § 521 (2004) (Exemption of Farmers' Cooperatives from Tax).

³¹*Tigner v. Texas*, 310 U.S. 141, 145 (1940).

³²*Id.*

³³Capper-Volstead Act, 7 U.S.C. § 291.

³⁴N.Y. GEN. BUS. LAW § 340 (McKinney 2013).

According to the second model, a limited number of farmers own the cooperative, but other farmers are allowed to join as vendors. The additional farmer vendors bring diversity to the market but do not necessarily encumber the operation by exercising organizational leadership. An example of this structure is the Farmers' Market Cooperative of East Liberty in Pittsburgh, Pennsylvania.³⁵ The East Liberty market is owned by four farming families and operates as a cooperative. The four families are the only farmers involved in the oversight of the market. Having a limited number of farmers owning the cooperative makes leading the market easier—having fewer members means fewer obstacles to executive authority. In this hybrid cooperative model, the market gets the benefit of streamlined leadership and the sense of community so important to a successful farmers' market. Cooperatives have a reputation for being quaint and home-spun; they are actually very sophisticated

business entities, and their tax implications are particularly unique.³⁶



The benefits that a well-run farmers' market brings to a community being manifold, public interest lawyers should consider farmers' markets to be a very practical form of social activism. Farmers' markets are an ideal delivery system for healthy, nutrient-dense foods, which are especially vital in urban communities without ready commercial access to such products. Public interest lawyers can readily ingrain socially conscious objectives into the architecture of the organization. Judicious drafting of legal documents such as bylaws can create incentives for members from low-income communities to participate. More farmers' markets are to be encouraged, and the right kind of legal guidance from a public interest attorney can maximize the social utility of each one.

³⁵Farmers' Market Cooperative of East Liberty (n.d.), <http://bit.ly/1359oH0>.

³⁶If you are interested in any kind of cooperative, you should familiarize yourself with Donald A. Frederick's report on the income tax treatment of cooperatives before you begin planning a new market (FREDERICK, *supra* note 29).



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