

**SUMMARY OF PROPOSED CHANGES TO
THE LGMA-APPROVED GUIDELINES**

Issues Addressed: Field Sanitation
Includes Issues 9, 10, 11, and 12

Prepared by:
Western Growers

To be submitted to the
Arizona Leafy Greens Technical Subcommittee &
California LGMA Technical Committee

July 17, 2020



BACKGROUND

Western Growers (WG) opened a comment period from May 4 to June 12, 2020, to gather proposed revisions to the leafy green guidance document. A total of 34 proposed revisions to the Field Sanitation section were submitted. WG hosted four web discussions to share those proposed revisions and get feedback from the leafy green industry. A total of 140 participants joined these two webinars. The list of the participants below is organized alphabetically and by webinar date.

June 24, 2020 - Part 1 discussion participants: 83 total participants

Last Name	First Name	Organization
Allan	Ariane	Fresh Kist Product
Alvarez	Ignacio	Bengard Ranch
Amaral	Matt	D'Arrigo Bros CA
Amaya	Albert	New Leaf Harvest
Anaya	Olga	Fresh Harvest Inc.
Arboisiere	Felice	Dole
Arroyo	Mara	Dole
Barriga	Maria	Bella Vista Produce, Inc
Berend	Natalie	Western Growers Insurance
Bramers	John	Merrill Farms
Brooks	Amanda	Harrison Farms
Burr	Kate	Church Brothers Farms
Calderon	Fiorella	Deardorff Family Farms
Camarena	Lupe	Nature Fresh Farms
Contreras	Patricia	Dole Fresh Vegetables
Covarrubias	Oscar	Foothill Packing Inc.
Davila	Berthita	Costa Farms
Denne	Kristina	Bonipak Produce
Dominguez	Cynthia	Duda Farm Fresh Foods
Duran	Dianey	Dole Fresh Vegetables
Falcon	Gonzalo	Dole
Fernandez-Fenaroli	Bonnie	Center for Produce Safety
Furukawa	Nob	Gold Coast Packing
Galaviz	Edgar	Bard Valley Date Growers Association
Gonzalez	Francisco	Duncan Family Farms

Gumowski	Adrian	AZDA
Hernandez	Emanuel	Sun Coast Farms
Hernandez	Teresa	Coastal Fresh Farms, Inc.
Hinkle	Lawrence	Andrew Smith Company
Horsfall	Scott	CA LGMA
Jimenez	Deanna	Dole Fresh Vegetables
Jones	Matt	WGA
Kelly	Lianna	Markon
Kempf	Beverly	Castellini
Kidd	Joanne	Mellon Farms
Litten	Lacy	Innovative Produce
Lomeli-Anaya	Daniela	Dole Fresh Vegetables
Lyons	Emily	WG
Marquez	Maira	SMT Farms
McEntire	Jennifer	United Fresh
McWilliams	Janet	Beachside Produce, LLC
Miller	Kelly	Griffin Family Farms
Miranda	Blanca	Braga Farms
Morales	Jose	Dole
Mudahar	Gurmail	Tanimura & Antle fresh foods
Niebla	Miguel	Harvest Tek de Mexico
Nunes	Kristina	The Nunes Company
Odello	Jake	The Nunes Co.
Olivas	Stephanie	Gila Valley Farms
Oliveros	Ruben	TLC
Oreggia	Tina	Muzzi Family Farms
Pereira	Colby	LGMA
Perez	Isela	Muranaka Farm Inc.
Perez	Ashley	Markon
Pina	Cosme	Taylor Farms California
Ponce	Carmen	
Pontureri	Jodi	SWRCB
Price	Robert	Dole Fresh Vegetable
Puga	Rocky	Central Coast Cooling LLC
Quijano	Gabriela	ERC Trade LLC
Quinlan	Connie	CA LGMA
Ravaliya	Kruti	US FDA
Saleen	Jeff	Primus Auditing Ops
Sanchez	Leo	WGIS
Shakespeare	Mark	Walmart Inc.
Sierra	Valentin	Amigo Farms, Inc.
Slinski	Stephanie	University of Arizona
Smekens	Kelly	Bonduelle Fresh Americas/Ready Pac
Smith	Michelle	US FDA
Stearns	Ken	D'Arrigo Bros Co., of California
Stergios	Christopher	Mainas Farms, LLC

Stover	Lauren	TopFlavor Farms
Talari	Manjula	Grimmway Farms
Thelander	Janessa	Barkley Company
Valdes	Francisco	Sabor Farms
Vallejos	Jennifer	Coastal Fresh Farms, Inc.
Vanderzyl	Jeremy	Duncan Family Farms
Villa	Daisy	Harrison Farms Inc.
Villaneva	Michael	MLV Food Safety Services
Villanueva	Marc	Bengard Ranch, Inc.
Weddle	Kami	Rousseau Farming
Kinder	Amy	Duda farm fresh foods
Ryan	Octavio	Dosta and sons

July 1, 2020 - Part 2 discussion participants: 57 total participants

Last Name	First Name	Organization
Anaya	Olga	Fresh Harvest
Anderson	Aaron	Pacific International Marketing
Arboisiere	Felice	Dole
Barnett	Norman	AZ Dept of Agriculture
Babu	Dinesh	Grimmway Farms
Banegas	Tony	Bonduelle Fresh Americas
Barriga	Maria	Bella Vista Produce Inc
Brooks	Amanda	Harrison Farms
Calderon	Fiorella	Deardorff Family Farms
Casas	Figueroa	TLC Custom Farming Company LLC
Castaneda	Gustavo	Ippolito International
Cavanaugh	Patrick	Vegetables West
Covarrubias	Oscar	Foothill Packing Inc.
Crossgrove	Gregory (Greg)	Gregory P. Crossgrove, Inc.
Davila	Berthita	Costa Farms, Inc.
Denne	Kristina	Bonipak Produce
Dominguez	Cynthia	Duda Farm Fresh Foods
Ellis	Kaylee	Grower-Shipper Assoc of SB & SLO Counties
Figueroa	Armando	Braga Fresh Family Farms
Galaviz	Edgar	Bard Valley Date Growers Association
Garcia	Jose	Hitchcock Farms Inc.
Gumowski	Adrian	AZDA
Hamil	Jean	Duda Farm Fresh Foods, Inc.
Hernandez	Emanuel	Sun Coast Farms
Hinkle	Lawrence	Andrew Smith Company
Horsfall	Scott	CA LGMA
Kelly	Lianna	Markon
Kempf	Beverly	Castellini

Klug	Tim	Sunsation Farms Inc.
Labastida	Ron	Babe Farms Inc.
Menfoza	Juan Carlos	Sabor Farms
Miller	Kelly	Griffin Family Farms
Miranda	Blanca	Braga Ranch
Odello	Jake	The Nunes Co.
Olivas	Stephanie	Gila Valley Farms
Oreggia	Tina	Muzzi Family Farms LLC
Pereira	Colby	LGMA
Perez	Ashley	Markon Cooperative
Quinlan	Connie	CA LGMA
Rock	Channah	UA
Runion	Danielle	AZDA
Saleen	Jeff	Primus Auditing Ops
Sarager	Jonathan	Western Growers
Scarcella	Mike	Ippolito International
Segura	Elizabeth	Shannon Ranches, Inc.
Sierra	Valentin	Amigo Farms, Inc.
Silva	Mason	Rancho Guadalupe, LLC
Slinski	Stephanie	University of Arizona
Smekens	Kelly	Bonduelle Fresh Americas/Ready Pac
Stergios	Christopher	Mainas Farms, LLC
Talari	Manjula	Grimmway Farms
Thelander	Janessa	Barkley Ag
Treadway	Ralph	Coastline Family Farms
Villaneva	Michael	MLV Food Safety Services
Valdes	Chato	Sabor Farms
Ruvalcaba	Nancy	AZDA
Ryan	Octavio	Costa and Sons

Field Sanitation Proposed Changes and Web Discussions Synopsis

WG received two proposals outlining revisions to Issues 9, 10, 11 and 12: Field Sanitation. These proposals were presented by the entities listed below (entity/spokesperson)

- Arizona LGMA – Vicki Scott
- California LGMA – Sharan Lanini

WG received two proposals outlining additional revisions to Issue 6: Agricultural Water. These proposals were presented by the entities listed below (entity/spokesperson)

- Duncan Family Farms – Jeremy Vanderzyl
- Innovative Produce, Faith Farming, Betteravia Farms, Bonipak Produce, Rancho Guadalupe, Point Sal Packing – Lacy Litten

After each proposal was discussed, opinion polls were conducted to gauge the acceptability of these proposed revisions. The results of our polling process are not binding. Not everyone participated in these polls, but the total number of participant votes are listed in each proposed revision summary. We encourage the use of the attached working draft of the CA LGMA-approved guidelines to better follow and understand the summary below. All the proposed revisions summarized below were submitted for both the Arizona and California LGMAs for consideration.

For certain proposed revisions below, a **blue font** was used to highlight the proposal's modified language. A blue underline font indicates a language addition and a blue strikethrough font indicates a language deletion. This was done for more complex proposals to properly outline exactly what is being changed.

Issue 6: Agricultural Water (additional revisions submitted during the *Field Sanitation* comment period)

Proposed Revision #6: Private well water and tertiary treated recycled water requirements in Table 2C (see page 36)

Proponent: Innovative Produce, Rancho Guadalupe, Betteravia Farms

Proposed Revision: Separate well water and tertiary treated recycled water into 2 distinct tables keeping existing metrics for tertiary treated water and proposing new metrics for private well water sources.

Rationale: Our focus for this proposal is on agricultural water systems, sourced mainly from Type A wells commonly found in the Santa Maria and Salinas Valleys. While Type A well water likely carries the lowest risk, the most recent metrics revision only gives a snapshot of water quality through initial and routine testing. With changes to the metrics over the past year, there has been confusion as to whether a well is its own system. In the effort to minimize this confusion, we clarified differences between agricultural water systems, water distribution systems, and water sources. Current metrics state that well water sources are not expected to contain generic *E. coli* due to natural filtration. However, regulated tertiary treated water may have low levels of generic *E. coli*. So, we separated out how private wells are regulated versus tertiary treated water. We are not making any changes to tertiary treated water, just separating the tables. We are removing every reference to the tertiary treated water in top section of Table 2C.

Poll Results: 78% in favor (30 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #7: Modify C1. *Baseline Microbial Assessment* in Table 2C (see pages 36 - 37)

Proponent: Innovative Produce, Faith Farming, Betteravia Farms, Bonipak Produce, Rancho Guadalupe, Point Sal Packing

Proposed Revision:

- Revise sample number (from 3 to 1)

- Change sampling location from end of system to any location within the distribution system
- Raising sampling frequency from 2x to 4x while reducing the time between samples
- Eliminate non-detectable generic E coli by changing acceptance criteria to <10 MPN/100 mL
- Reduce days to harvest window from 21 days to 7 days

View the working draft for the complete revision.

Rationale: Multiple samples from a water source taken over the course of several days or weeks provides a better assessment of water quality than water samples taken consecutively during the same irrigation event. Current metrics allow growers flexibility to conduct initial and routine sampling during periods of the season where there may be lower microbial risks. Proposed changes offer a better detection solution allowing for verification of water source quality and agricultural water system integrity.

Poll Results: 69% in favor (30 total votes)

Questions/Comments:

Question: How will 5 irrigation events be handled for crops with a short growing period that may not have five irrigation events?

- *Response:* As it is right now, your two initial samples have to be taken no less than 7 days apart, but by reducing the time interval on when those samples can be taken to no less than 18 hours apart, you should be able to get your 5 samples still within the 7 days that is currently in the metrics.

Proposed Revision #9: Water quality testing in Table 2C (see pages 37 - 40)

Proponent: Innovative Produce, Faith Farming, Betteravia Farms, Bonipak Produce, Rancho Guadalupe, Point Sal Packing

Proposed Revision: Remove sections “Initial Microbial Water Quality Assessment” and “Routine Verification of Microbial Water Quality” and replace with new proposed section “Monthly Water Quality Testing.” View the working draft for the complete revision.

Rationale: To bring back into the metrics a requirement for monthly water quality testing and defined it based on previous metric requirements. The proposal was to allow monthly water sampling to verify water quality throughout the entire growing season. Currently, the initial and routine testing give growers the flexibility to take their initial and routine testing at times of the season where there may be lower microbial risk. We feel the monthly water quality gives you a better a of what your water quality looks like throughout the season.

Poll Results: 66% in favor (28 total votes)

Questions/Comments:

Comment: I want everyone to understand that the initial work that was done on water treatment sampling and testing was done in consultation with the top scientists in this area, including Dr. Rock, Dr. Suslow, etc. The criteria for the science and the concept of this whole thing is based on a risk reduction scenario. This proposal is trying to go backwards to an old metrics and not improve things. It may make it easier for some growers, but that’s not the point of the process. The point is to make incremental improvements. We are all under a lot of pressure from FDA and buyers and I think we are totally missing the point here and moving backwards to something that obviously the initial concepts of the risk assessment approach are not being considered here.

- *Response:* I'd like to ask a question then because the LGMA is made up of all shippers and requests from their buyers. Why are we still required by our shippers and buyers to take monthly water quality sampling if it's taking steps backwards. Because at this point, my shippers and their buyers are requiring that, I take monthly water sampling within the LGMA acceptance criteria on the month that I'm not actually testing for LGMA. I'm expected to follow these guidelines every month out of the year anyways.
 - *Response:* Change is difficult and we knew that a lot of the buyers probably weren't going to want to embrace this right away, but we wanted to put in the most recent science and use things are going to potentially strongly increase the value of the metrics and make them stronger. Buyers can ask for all kinds of things, but hopefully in the end the science will prevail. So, you're asking for a buyer to automatically totally embrace the LGMA metrics and that's not in their very nature. It is what it is. If you want to keep those customers then you do a monthly test, but to go backwards in the metrics I think is a horrible idea and was not part of our initial thinking in trying to take the water issues off the table so the buyers wouldn't be making these crazy requests.

Proposed Revision #10: Remove potable / drinking water standard in Table 2F (see page 56)

Proponent: Duncan Family Farms

Proposed Revision: Delete all references to testing for total coliforms in Table 2F.

Delete in left column:

“Remedial Actions Monitoring Criterion for total coliforms monitoring level failure:

5/5 samples with a maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction based on the untreated water's baseline total coliform levels (refer to Appendix A for log reduction guidance)”

Delete in right column:

Total coliforms

- 1) If these water samples fail to meet the monitoring criterion perform a root cause analysis and continue to evaluate your irrigation treatment system to identify and correct any failures and continuing to test as described in this step until the water is back in compliance (see Appendix A for guidance on troubleshooting irrigation treatment system failures).
- 2) Water can still be used as a Type A system and no pre-harvest pathogen testing is required as long as the generic E. coli acceptance criterion is met.

Rationale: Potable (drinking) water systems do not compare to ag irrigation systems. A maximum 10 MPN/100 mL has already reduced the risk probability by a log - from an average of 126 MPN/100 mL in the 21-day window.

Poll Results: 64% in favor (27 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #11: Change 21 days-to-harvest window to 7 days in Table 2F (see page 56)

Proponent: Duncan Family Farms

Proposed Revision: Change 21 days to 7 days to scheduled harvest.

Rationale: 21 days is extremely conservative, and the water group consensus document states 21 day needs additional refinement; tighter microbial criteria is more than adequate with FSMA die-off language and risk.

Poll Results: 54% in favor (27 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #12: Sampling location in Table 2F (see page 56)

Proponent: Duncan Family Farms

Proposed Revision: Remove the requirement for “a minimum of one from the last sprinkler head, i.e., at the last point of contact with the crop - last sprinkler head.”

Rationale: This continues Type A monitoring throughout the system.

Poll Results: 65% in favor (25 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #13: Eliminate potable water standard in Table 2F (see page 56)

Proponent: Duncan Family Farms

Proposed Revision: ~~80% non-detectable-g~~ Generic *E. coli* in 100 mL and < 10 MPN as the per single sample maximum ~~for one (1) sample~~

Rationale: A maximum 10 MPN/100 mL has already reduced the risk probability by a log - from an average of 126 MPN/100 mL in the 21-day window.

Poll Results: 70% in favor (25 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #14: Well exemption in Table 2G (see page 58)

Proponent: Innovative Produce, Faith Farming, Betteravia Farms, Bonipak Produce, Rancho Guadalupe, Point Sal Packing

Proposed Revision: Remove wells from the monthly testing exemption

For wells and municipal water sources, if generic *E. coli* are below detection limits for five consecutive monthly samples, the requirements for 60 days...”

Rationale: We propose removing wells from the Exemption for Post-Harvest Direct Product Contact or Food-Contact Surfaces water. This water poses a higher risk to the crop and should be regularly monitored to verify the U.S. EPA Maximum Contaminate Level Goal for generic *E. coli* or contain an approved disinfectant at a sufficient concentration to prevent contamination.

Poll Results: 65% in favor (22 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Audience Question: Do you agree with the overall proposal to separate private wells from tertiary treated water supplies (Revising Table 2C for private wells and creating a new table consisting of existing metrics for tertiary treated water supplies)?

79% in favor (28 total votes)

Proposed Revision #1: Definition for *Cyclospora cayetanensis* (see page 8)

Proponent: AZ LGMA

Proposed Revision: New definition – “*Cyclospora cayetanensis* is a human parasitic pathogen that causes a gastrointestinal infection in humans called cyclosporiasis. Individuals can become infected through ingestion of contaminated food or water.”

Rationale: The term is used in text and should be defined.

Poll Results: 86% in favor (27 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Issue 9: Harvest Equipment, Packaging Materials, and Buildings (Field Sanitation)

Proposed Revision #15: Equipment cleaning and sanitizing in Best Practices (see page 73)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add “or when moving between commodities and fields and when excessive soil has built up.” to the second bullet point.

Rationale: This addresses contamination risk from movement between commodities/fields and from excessive soil buildup.

Poll Results: 76% in favor (40 total votes)

Questions/Comments:

Question: How will commodities be defined by company SOP as each individual spring mix component considered as a different commodity?

- *Response:* The commodity of spring mix is just that. We weren't intending to isolate every component of that. When you're harvesting in a particular field of spring mix, you move to another location, that's when this would apply. This is not new language actually, just the excessive soil part.

Comment: When I read these guidelines, we are putting everything together. I personally believe that we should separate these and be more stringent about processing in the field versus what we are doing per commodity in retail. In some areas, if we are putting everything together as one commodity, I think it needs to be looked at.

- *Response:* Perhaps we can add another word in here and use the word product and commodity and fields. But we are trying to increase the practice of cleaning and sanitation through contact

surfaces when we are moving. So, we are trying to up the food safety ante here by using language that suggests we need to clean more often.

Question: How do you quantify excessive soil as people will have different standards?

- *Response:* We didn't quantify it. Obviously it's going to require an inspection. We already had a daily harvest cleaning and sanitizing at the end of each daily harvest. The point we are trying to make here is – you're going to clean it at the end of each daily harvest as you're moving between fields or changing commodities or if you're working in conditions and can see that your machine is becoming dirty and has extra soil on it. So, it's definitely subjective. It doesn't have any parameters, but we just have to acknowledge that we have to clean these machines more often so that's one of those issues.

Question: How can "excessive soil" be audited?

- *Response:* It can't. We are trying to move towards raising our food safety practices and trying to be more protective and asking companies to make some sort of assessment. We are in the section of Best Practices and are trying to just give guidance. The word excessive is used other times in the document so maybe that's something we can look at.

Comment: Change it to "visible soil" or just "when excessive soil has built up".

Comment: It would be nice to assign a site where we can have equipment wash without risking any other commodity around the block where crews are working.

Proposed Revision #16: Equipment cleaning and sanitizing in Best Practices (see page 73)

Proponent: AZ LGMA; support by CA LGMA

Proposed Revision: Revise "~~Locate e~~Equipment, ~~tool, and container~~ cleaning and sanitizing operations [should take place](#) away from..."

Rationale: This revision cleans up existing language.

Poll Results: 67% in favor (40 total votes)

Questions/Comments:

Question: Will the cleaning be done following FDA recommended cleaning procedures 7 steps as this cleaning can take several hours and not feasible?

- *Response:* We are in best practices are not being prescriptive about how your cleaning should be done.

Proposed Revision #17: Wearing of PPE in Best Practices (see page 73)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add a new bullet - "Harvester sanitation personnel must utilize PPE equipment such as gloves, aprons, boots, face shields, respirators (if required) in such a way as to prevent cross-contamination of harvest equipment, tools, etc."

Rationale: This addresses potential cross-contamination from personnel.

Poll Results: 70% in favor (43 total votes)

Questions/Comments:

Question: Boots, respirators and face shields? What cross contamination issue are you talking about? What study is being referred to? I don't know of anything that realistically should be considered.

- *Response:* Well if you store your PPE inappropriately, we already addressed the use of other food contact surface type equipment in other areas. But we never addressed the sort of equipment that's actually used by the guys that are cleaning your machines. So, there's no particular study with regards to this, it's just a best practice.

Comment: I think some people are going to have a hard time with this one because everyone defined PPE differently.

- *Response:* There was a suggestion by the CA LGMA to potentially add a glossary term for sanitation PPE, so that's something we may add.

Comment: Re-usable cleaning tools (brushes) need to be also stored in a designated location.

- *Response:* This will be addressed later in the document.

Comment: PPE is an HR issue.

- *Response:* When we are working with food contact surfaces during harvest, that's one thing. When we move into cleaning of the machines, we definitely have both occupational safety and health issues, as well as food contact surfaces. So, we have used an occupational safety and health term by using PPE in order to kind of cross over for both of that by saying harvest sanitation personnel are keeping that implication that this is food contact surfaces and then also including the PPE. Obviously, when you're using chemicals to clean a machine, much of that equipment is there for PPE.

Comment: Per Greg's comments, when "intent" is stated, it doesn't mean that a person who reads the sentence will understand that and take a different understanding. We need to be as specific as possible when defining Best Practices.

- *Response:* When we finally get to the point of making a change in the metrics, we will do trainings on these things. So, there is a lot of opportunity for questions and clarification and answering. But again, we are in best practices are just suggesting changes to your SOP's.

Proposed Revision #18: Chemical security in Best Practices (see page 73)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add a new bullet - "Harvest sanitation crew must store all cleaning and sanitation chemicals in a secure location."

Rationale: This prevent cross-contamination.

Poll Results: 61% in favor (43 total votes)

Questions/Comments:

Question: Can a secure location be the truck beds?

- *Response:* Well you have to secure all chemicals. We talk about that in other areas. That usually means in a place that has controlled access and that's why we use the word secure. So, if the bed

of your truck has a locked top on it, then that would be secure. If it's open and anybody can have access to it, then I don't think that would be considered secure.

Proposed Revision #19: Documentation in Best Practices (see page 73)

Proponent: AZ LGMA; support by CA LGMA

Proposed Revision: Add a new bullet - "Documentation (logs or records) must be maintained daily for every harvest equipment container, equipment, and tool cleaning and sanitation event. Records must be reviewed, dated, and signed by a supervisor or responsible party within a week after the records are made."

Rationale: These activities must be documented.

Poll Results: 76% in favor (41 total votes)

Questions/Comments:

Question: Are you trying to eliminate weekly logs?

- *Response*: No, we are saying that your records have to be maintained every day. We are not saying that you cannot summarize them in a weekly format.

Proposed Revision #20a: SOP for harvest equipment, tools, and containers in Best Practices (see page 73)

Proponent: AZ LGMA

Proposed Revision: Add "tools"; Delete "containers".

Rationale: Redundant with SOP for harvest containers below; propose keeping harvest containers SOP separate from equipment & tools SOP.

Poll Results: 69% in favor (41 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #20b: SOP for harvest equipment, tools, and containers in Best Practices (see page 73)

Proponent: CA LGMA

Proposed Revision: Add "container" to this SOP.

Rationale: These items still apply to containers.

Poll Results: 74% in favor (39 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #21: SOP for harvest containers in Best Practices (see page 73)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Move and revise existing bullets - “[Prior to beginning harvest, conduct a daily inspection, that addresses cleaning, and sanitation or noticeable change in conditions since prior sanitation. If necessary, rinse and sanitize food contact surfaces on harvest equipment \(i.e., accumulation of dirt, debris, dust, droppings, etc.\).](#)”

Rationale: Adds clarity and reduces redundancy.

Poll Results: 85% in favor (39 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #22a: Harvest tool storage in Best Practices (see page 74)

Proponent: AZ LGMA

Proposed Revision: Add new bullet - “Prior to harvest crews exiting for breaks, harvest tools should be placed in a receptacle containing clean, untouched, microbially potable, and sanitized water.”

Rationale: This reduces potential for cross-contamination of knives/tools.

Poll Results: 94% in favor (35 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #22b: SOP for harvest equipment, containers, and tools in Best Practices (see page 74)

Proponent: CA LGMA

Proposed Revision: Add new bullet - “Water used should be safe and of adequate sanitary quality for its intended use.” Delete “containing clean, untouched, microbially potable, and sanitized water.” from the previous bullet point proposed by the AZ LGMA.

Rationale: Use FSMA language to describe ag water used in these circumstances.

Poll Results: 89% in favor (35 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #23: SOP for harvest equipment, containers, and tools in Best Practices (see page 74)

Proponent: AZ LGMA

Proposed Revision: Revise “[Consider methods that aid in Ssanitation verification.](#)”

Rationale: This adds clarity.

Poll Results: 85% in favor (35 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #24a: SOP for harvest equipment, containers, and tools in Best Practices (see page 74)

Proponent: AZ LGMA

Proposed Revision: Move language from Sanitary SOP - "Maintenance, cleaning, and sanitation schedules for equipment used in hydration must be maintained daily." This is moved from the SOP below in the document.

Rationale: This pertains to equipment cleaning and sanitation.

Poll Results: 90% in favor (35 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #24b: SOP for harvest equipment, containers, and tools in Best Practices (see page 74)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA's proposed language by deleting "daily".

Rationale: To assure companies can determine frequency requirements.

Poll Results: 94% in favor (36 total votes)

Questions/Comments:

Comment: Daily cleaning of a large water tank is not practical.

- *Response*: That's why we took out daily.

Comment: Extra harvesting machines are kept on hand in the field in case of a breakdown so a clean and sanitized harvester can be kept in field.

- *Response*: As long as you're following your procedure then you're probably good to go. Again, these are SOP's that individuals are going to tweak and put into their programs.

Proposed Revision #25: SOP for harvest equipment, containers, and tools in Best Practices (see page 74)

Proponent: CA LGMA

Proposed Revision: Revise existing bullet - "~~Control Management~~ procedures when equipment is not in use (i.e., end of season). To include ing a policy for removal of equipment from the work area (i.e., containers, scabbards, sheaths, or other harvest equipment)~~or site and the use of scabbards, sheaths or other storage equipment.~~"

Rationale: Update based on previous edits in the above rows.

Poll Results: 79% in favor (36 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #26: SOP for harvest containers in Best Practices (see page 74)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add bullet - "Daily inspection" to SOP.

Rationale: Separated SOP for containers from SOP for equipment and tools for added emphasis and clarity to this issue.

Poll Results: 74% in favor (37 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #27: SOP for harvest containers in Best Practices (see page 74)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add bullet - “Proper cleaning and sanitation – routine and for changes in conditions of materials.” to SOP.

Rationale: Separated SOP for containers from SOP for equipment and tools for added emphasis and clarity to this issue.

Poll Results: 76% in favor (37 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #28a: Vulnerability of cut surfaces in Best Practices (see page 74)

Proponent: AZ LGMA

Proposed Revision: Revise existing bullet – ~~“Establish and implement appropriate measures that reduce and control the potential introduction of human pathogens at the cut surface during and after mechanical harvest operations. Due to the cut surface being more vulnerable to microbial contamination, this best practice is extremely important. Take all practical means to reduce the possibility of introduction of contamination at this process step.”~~ to read: “Cut surfaces are vulnerable to microbial contamination. Prepare an SOP that minimizes the potential introduction of contamination during and after mechanical harvest operations.”

Rationale: The proposed language makes this bullet simpler and more precise.

Poll Results: 61% in favor (31 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #28b: Vulnerability of cut surfaces in Best Practices (see page 74)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA’s proposed change - “Cut surfaces are vulnerable to microbial contamination. Prepare an SOP that prohibits ground contact to avoid cross-contamination and minimizes the potential introduction of contamination during and after ~~mechanical~~ harvest operations.”

Rationale: This adds clarification.

Poll Results: 56% in favor (38 total votes)

Questions/Comments:

Comment: Mechanical harvesting is probably the highest risk for contaminating product, and this is stated in the original statement that is being eliminated. It should not be eliminated. We need to ensure that mechanical harvesting operations are kept in the forefront of a probable contamination source.

- *Response:* We didn't eliminate it, we just made it more all-encompassing. We want to make sure that product is not cross contaminated.

Comment: The way i read it this prohibits ground packing.

- *Response:* Correct, that's where we are headed.

Question: So, is there no more ground crews?

- *Response:* There's way you can do it. We've been doing it for a while. A lot of clever ways to manage that.

Question: What is the scientific reasoning behind limiting grand crews?

- *Response:* We are just saying that no food contact surfaces can hit the ground, not that you can't have ground crews. Channah Rock's recent research regarding contamination and the movement of contaminated product is pretty telling about what the potential is if an area has unknown contaminants and what that can cause. So, there is justification from a scientific perspective to limit this type of activity moving forwards.

Question: Are the buyers going to pay more?

- *Response:* We are asking you to prepare an SOP that describes your practices that are going to prohibit ground contact. How are you going to describe that? Depending on how you develop that SOP, there may be no extra cost at all.

Question: Celery ground crews use carts to pack products, but boxes sometimes need to touch the ground when loading onto trailers. Are pallets a way to avoid contacting ground?

- *Response:* Not if that pallet is touching the ground.

Question: Can you elaborate more on the options for ground crews to avoid ground contact?

- *Response:* I'm not going to give an engineering answer here. There are ideas out there if you are looking around. We are getting clear signals from buyers and customers to move away from these practices.

Comment: It isn't only about creating clever ways, but the issue would be production rate.

Question: If a pallet is on the ground doesn't it mean that the product is raised off the ground?

- *Response:* That is for the growers to describe in their SOP's. We are trying to get away from this product actually contacting the ground and there is science behind it. We are talking about cut surfaces and creating an SOP that eliminates contact with those cut surfaces.

Question: During ground pack operations, will auditors continue to recognize the technicality of leaves as a buffer to the product and the ground?

- *Response:* They are talking about peeling off leaves and making an extra barrier between the bed and the product like wrapper leaves on iceberg lettuce. I would refer to Trevor Suslow's work that show leaves can still be a conductor of cross contamination. So, using leaves in that way would probably be a really bad idea actually.

Question: Soil contact(ground) with cut surfaces of plant would be permitted. Existing plant material can be used.

- *Response:* No, we don't agree that should be permitted.

Proposed Revision #28c: Re-circulated rinse or antioxidant solutions in Best Practices (see page 74)

Proponent: AZ LGMA

Proposed Revision: Revise existing bullet - "If re-circulated rinse or antioxidant solutions are used on the cut surface, [ensure that water used meets requirements in Table 2G](#). Take all practicable precautions to prevent ~~them~~ [rinses and solutions](#) from becoming a source of contamination."

Rationale: To ensure water meets harvest requirements in Table 2G.

Poll Results: 97% in favor (34 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #29a: Equipment and tool design in Best Practices (see page 75)

Proponent: AZ LGMA

Proposed Revision: Revise existing bullet - "Design equipment and tools to facilitate cleaning [to a microbiologically clean level](#): [Food equipment must be constructed and maintained to ensure effective and efficient cleaning of the equipment over its lifespan. The equipment should be designed as to prevent bacterial ingress, survival, growth, and reproduction on both produce food-contact and non-product contact surfaces of the equipment, by using materials and construction that facilitate cleaning of non food contact surfaces and cleaning and sanitation of food contact surfaces \(e.g., transportation tarps, conveyor belts, etc.\)](#)."

Rationale: There are several bullet points beneath here that we tried to compress. We took those all below and combined it into this one statement.

Poll Results: 73% in favor (34 total votes)

Questions/Comments:

Question: Are we removing the examples below?

- *Response:* Yes.

Comment: Conveyors or production equipment would be the best way to describe.

Proposed Revision #29b: Equipment and tool design in Best Practices (see page 75)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA's proposed language - "Design [food contact](#) equipment and tools to facilitate cleaning [to a microbiologically clean level](#)".

Rationale: Clarify/simplify terms and language.

Poll Results: 73% in favor (32 total votes)

Questions/Comments:

Question: This is too specific. How do you design non-food contact surfaces such as tires, chains, tarps, and other areas to prevent bacteria ingress are cleanable?

- *Response:* It wasn't meant to be tires, but to be those other surfaces on harvest equipment that aren't actually a food contact surface. We should consider some other language there that would be clearer. But it wasn't exactly meant to dive into field tractors etc., but really about harvest machine adjacent to food contact surfaces.

Comment: I suggest taking non-food contact surfaces out of this for clarity.

Comment: This should apply to all farm equipment and tractors.

Proposed Revision #30: Equipment and tool design in Best Practices (see page 75)

Proponent: AZ LGMA

Proposed Revision: Delete bullet - "Seams on food-contact surfaces on equipment and tools must be smoothly bonded or maintained to minimize accumulation of dirt, filth, food particles, and organic materials and the opportunity for harborage or growth of microorganisms."

Rationale: Eliminate detailed language; addressed in general in Harvest Equipment and Tool SOP

Poll Results: 73% in favor (32 total votes)

Questions/Comments:

Comment: The examples are good for clarity. I think a reference point is good. People get confused about what is exactly being asked.

Proposed Revision #31: Modify equipment and tool design in Best Practices (see page 75)

Proponent: AZ LGMA

Proposed Revision: Delete the existing bullet points below:

- Establish policies and implement sanitary design principles that facilitate frequent and thorough cleaning of non-food-contact surfaces and cleaning and sanitizing of food-contact surfaces.
 - Establish sanitation and/or cleaning frequency of food-contact and non-food contact surfaces of equipment, tools, and containers by developing and implementing Sanitation Standard Operating Procedures (SSOPs) and a sanitation schedule for machine harvest operations.
 - the use of cleaning verification methods for harvesting equipment (e.g., ATP test methods).
 - Document the date and method of cleaning and sanitizing. A supervisor or responsible party must review, date, and sign these records within a week after the records are made.
- Develop and implement appropriate cleaning, sanitizing, storage, and handling procedures of all equipment and food-contact surfaces to reduce and control the potential for microbial cross-contamination.

Rationale: This eliminates redundant language as it's already addressed in the Harvest Equipment and Tool SOP.

Poll Results: 85% in favor (32 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #32a: Packing materials in Best Practices (see page 75)

Proponent: AZ LGMA

Proposed Revision: Add the bullet points below:

- Food packing materials must be of adequate food safety design and quality for their intended use, which includes:
 - Cleanable and/or designed for single use to prevent the possible growth or transfer of pathogens.
 - Store packing containers and materials off the floor or ground.
 - If packing materials are re-used, ensure that food contact surfaces are clean or lined with a new liner.
 - Consider obtaining a letter of guarantee for reusable containers if not cleaned in-house.
 - Packaging containers shall be free of breaks, cracks or broken or missing pieces.

Rationale: Combine bullet points into a common section on food packing materials.

Poll Results: 91% in favor (32 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #32b: Packing container storage in Best Practices (see page 75)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA's proposed language - "Store packing containers and materials off the floor or ground and protected to the degree possible to prevent contamination covered or in a covered area."

Rationale: Use language consistent with FSMA PSR.

Poll Results: 94% in favor (33 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #32c: Packing containers in Best Practices (see page 75)

Proponent: CA LGMA

Proposed Revision: Revise "Packaging containers shall be adequate for their intended use free of breaks, cracks or broken or missing pieces."

Rationale: Use language consistent with FSMA PSR.

Poll Results: 94% in favor (33 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #33: Modify Buildings contamination in Best Practices (see page 76)

Proponent: AZ LGMA

Proposed Revision: Revise “~~Take proper precautions to reduce potential for contamination of food contact surfaces or packaging materials.~~ Reduce the potential for contamination of food contact surfaces by effective building design including the separations of operations in which contamination is likely to occur. Suggestions are by location, time, partition, enclosed systems, or other effective means.”

Rationale: This clarifies and reduces redundancy.

Poll Results: 94% in favor (31 total votes)

Questions/Comments: There were no comments or questions for this proposal.

Issue 10: Harvest Personnel – Direct Contact with Soil and Contaminants During Harvest (Field Sanitation)

Proposed Revision #34: Research citation in Issue 10 introduction (see page 76)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add citation for “Rock/Suslow, unpublished”.

Rationale: We are referencing this here because much of what was learned during that research study is included in our comments below.

Poll Results: 77% in favor (30 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #35: Employee training in Best Practices (see page 76)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add bullet - “Ensure employees have been trained on the importance of minimizing the potential of cut product to contact the soil.”

Rationale: This sensitizes employees to food safety issues with soil contact.

Poll Results: 80% in favor (30 total votes)

Questions/Comments:

Comment: Are we going to make this document an SOP? If you add all these specific requirements rather than letting the handler make their own SOP's

- Response: I think the way that we worded #35 is definitely going a metric and expectation that that is part of your normal preseason or prior to starting work training program.

Comment: Also emphasize minimizing amount of soil entering the product/process if product is destined for a processing facility reducing amount of organic matter will reduce listeria concerns.

Proposed Revision #36: Field conditions in Best Practices (see page 76)

Proponent: AZ LGMA

Proposed Revision: Added to existing bullet: “Evaluate the field for conditions that are likely to increase the risk of soil contact with cut product”...

Rationale: Call for increased surveillance (i.e., focus visual inspection on amount of in field debris, excess mud on plants, other potential sources of contamination). See Appendix F. Daily Harvest

Poll Results: 62% in favor (31 total votes)

Questions/Comments:

Question: What is excess? How is this going to be measured?

- *Response*: I think we all know the difference between regular field harvest conditions and when we have stressors or a rain event that created muddier conditions. It’s just going to be something you need to evaluate.

Question: Should we include rain events as an example?

- *Response*: We didn’t here, but certainly that’s a good suggestion and can find its way into the document.

Comment: If it's in the metrics and it's an audit point it has to be a measurable item.

- *Response*: Well that’s a checklist thing and has to happen after any changes are made. It’s a process.

Question: Will processors cancel all their orders after a rain event so that they don’t put the burden on the harvesters, specifically when harvesting with machines?

Proposed Revision #37: Field conditions in Best Practices (see page 76)

Proponent: AZ LGMA

Proposed Revision: Revise “~~and employ measures to minimize Evaluate appropriate measures that reduce and control~~ the potential introduction of human pathogens through soil contact ~~of cut product at the leafy green cut~~ surface.”

Rationale: Focus on action word “employ” instead of “evaluate”.

Poll Results: 55% in favor (31 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #38: Soil contact in Best Practices (see page 76)

Proponent: AZ LGMA

Proposed Revision: Replace existing bullet – “~~Do not stack soiled bins on top of each other if the bottom of one bin has had direct contact with soil unless a protective barrier (i.e., liner, cover, etc.) is used to separate the containers.~~” with - “Packaging material should not have direct contact with soil. Physical barriers (i.e. liners, covers, existing plant material or other clean barriers) should be used to separate from soil.”

Rationale: Broaden description from bins to packaging.

Poll Results: 52% in favor (28 total votes)

Questions/Comments:

Question: Are we going to ban field packing in the metrics?

- *Response*: No, the product just can't touch the soil.

Question: Can you clarify why the bin stacking without a liner is being removed? Or was it being moved to a different section?

- *Response*: We are trying to use a broader term and not just the use of bulk bins. There are other packaging materials that shouldn't have contact with the soil.

Comment: I don't think of a bin as packaging material so I would recommend we include that in the definitions section.

- *Response*: It's a food contact surface.

Question: Will already harvested product be considered a barrier for ground packed product?

Question: Field packing implies direct contact with the soil.

Issue 11: Field and Harvest Personnel – Transfer of Human Pathogens by Workers (Field Sanitation)

Proposed Revision #39: Antiseptic/sanitizer use in Best Practices (see page 77)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add to existing bullet - "Use of antiseptic/sanitizer or wipes, as a substitute for soap and water, is not permitted."

Rationale: Need to highlight earlier in section discussing handwashing.

Poll Results: 70% in favor (26 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #40a: Latex allergies in Best Practices (see page 77)

Proponent: AZ LGMA

Proposed Revision: Add new bullet - "The use of latex in gloves or other PPE is prohibited due to allergy concerns for workers and consumers."

Rationale: The committee feels that no-latex practices are in widespread use in the industry.

Poll Results: 65% in favor (31 total votes)

Questions/Comments:

Question: Isn't the use of latex a personal protection issue and not a food safety issue and does not need to be in the metrics?

- *Response*: It's an allergy so it is a food safety issue.

Question: I'm not allergic to latex, so why should I not be allowed to use them?

- *Response:* Because it's a foreign material that is allergic to some people and if it gets into the food then you got a real issue. This is more about allergies with consumers.

Question: Is latex listed as an allergen?

- *Response:* If you're looking at food allergens, no, but it is a personal allergen.

Comment: Latex is not a food allergen and should not be in the metrics

Proposed Revision #40b: Latex allergies in Best Practices (see page 77)

Proponent: CA LGMA

Proposed Revision: Add- "Prohibit use of personal gloves and taking gloves home." to AZ LGMA's proposal (#40a)

Rationale: Stronger emphasis on prohibiting use of latex-containing PPE.

Poll Results: 81% in favor (31 total votes)

Questions/Comments:

Comment: This should be specified for single use gloves.

- *Response:* We are just saying don't use latex. We aren't about to dictate that level of granularity. This is just about latex and an extra statement about taking gloves home.

Question: Can gloves be taken off and put back on? or is that automatically considered not sanitary?

- *Response:* It depends on the type and thickness of the gloves. If so, they need to properly sanitized.

Proposed Revision #41a: Worker health practices program (SOP) requirements (see page 77)

Proponent: AZ LGMA

Proposed Revision: Add new bullet - "Additional training and education on infectious illnesses that can be asymptomatic (e.g., cyclosporiasis, hepatitis, COVID -19)".

Rationale: Increased awareness needed based on recent outbreaks.

Poll Results: 58% in favor (31 total votes)

Questions/Comments:

Question: COVID is an HR issue, and has not been proven to survive in vegetables. Are we going to list every illness?

- *Response:* That's just an example.

Proposed Revision #41b: Worker health practices program (SOP) requirements in Best Practices (see page 77)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA's proposal - "Additional training and education on infectious illnesses that can be asymptomatic (e.g., cyclosporiasis, hepatitis, COVID -19) [must be included in existing health and hygiene SOPS.](#)"

Rationale: Need to make this mandatory.

Poll Results: 58% in favor (31 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #42: Worker health practices program (SOP) requirements (see page 77)

Proponent: AZ LGMA

Proposed Revision: Replace existing bullet - [Actions for employee to take in the event of injury or illness i.e., notifying a supervisor or other responsible party](#) with "[Instruct personnel to notify their supervisors if they may have a health condition that may result in contamination of covered produce or food contact surfaces. Companies shall develop & communicate return to work policies for returning employees to food contact positions after an illness or injury.](#)"

Rationale: This strengthens the requirement.

Poll Results: 59% in favor (31 total votes)

Questions/Comments:

Question: Are we sure that this is not a violation of an employee's privacy right if we direct employees to disclose information about medical conditions?

- *Response*: I don't think we were going that far. We are trying to keep people with infectious disease from handling covered produce or food contact surfaces. You have the ability to write your SOP in whatever way you want, but we can't have infectious people handling product or food contact surfaces.

Question: Can you please let me know what we will do with any employees that have this illnesses Examples of chronic illnesses are: Alzheimer disease and dementia, Arthritis, Asthma, Cancer, COPD, Crohn disease, Cystic fibrosis, Diabetes."

Proposed Revision #43a: Field sanitary facility program (SOP) (see page 78)

Proponent: CA LGMA

Proposed Revision: Add bullet & reformat existing bullet into sub-bullets:

- [Prohibit the cleaning of portable toilets bordering growing fields](#)
- ~~¶~~The number, condition, and placement of field sanitation units according to:
 - ~~¶~~Federal, state or local regulation
 - ~~¶~~The accessibility of the units to the work area
 - ~~¶~~Facility maintenance
 - ~~¶~~Facility supplies [i.e., hand soap, water (use of antiseptic/sanitizer or wipes, as a substitute for soap and water, is not permitted), single-use paper towels, toilet paper, etc.]
 - ~~¶~~Facility signage

- Facility cleaning and servicing

Rationale: Addresses hazards from cleaning toilets close to fields; reformatting to make it easier to read.

Poll Results: 69% in favor (31 total votes)

Questions/Comments:

Question: Is "bordering" defined in the definition section? We see this a lot. Maybe we create a distance or barrier metric?

- *Response*: We didn't want to be too prescriptive, but we also wanted to get those cleaning operations away from the fields.

Question: Is that new requirement exclusive to harvester portables? Or stationary grower units as well?

- *Response*: These are for portable toilets. It says portable.

Comment: Substitute "growing fields" with "unharvested product".

Proposed Revision #43b: Field sanitary facility program (SOP) (see page 78)

Proponent: AZ LGMA

Proposed Revision: Revise "The number, condition, [frequency, type, and location of cleaning \(i.e., field permanent vs. harvest placement\)](#) ~~and placement of field sanitation units according to~~"

Rationale: This outlines the frequency and type of cleaning to take place and distinction between field/ranch units and harvest units. We do think there is a difference on toilet locations between harvest and other events.

Poll Results: 63% in favor (30 total votes)

Questions/Comments:

Question: How far away? this needs to be defined since currently toilets are cleaned very close to fields. Also is cleaning and emptying the toilet the same thing or different?

- *Response*: We didn't specify a distance because the distancing will vary. The intention of the language "bordering" is immediately next to the field. Maybe a better word instead of cleaning would be servicing.

Question: How far should the restroom be? We need a distance if this is going to be prohibited. Are there are SOPs for proper cleaning and spills?

- *Response*: Yes, there are SOP's for proper cleaning and spills. We already addressed restroom distance.

Comment: "There are toilets in every field where product is growing (mainly for irrigators, etc.), not only when product is being harvested. moving these toilets every service is not feasible

Proposed Revision #43c: Field sanitary facility program (SOP) (see page 78)

Proponent: CA LGMA

Proposed Revision: Delete "major" from requirement to have a leak response plan

Rationale: All leaks and spills must be addressed – not just “major” leaks and spills.

Poll Results: 77% in favor (30 total votes)

Questions/Comments:

Proposed Revision #44a: Equipment designated for cleaning/sanitizing in Best Practices (see page 78)

Proponent: AZ LGMA

Proposed Revision: Add three new bullet points.

“Whenever appropriate, segregate and properly label, (i.e., color code, tool description) cleaning and sanitizing equipment and tools to prevent misuse or cross-contamination (i.e., tools used for bathroom cleaning).”

“Ensure that workers are trained on concepts of tool separation and color coding.”

“If applicable, cleaning tools ~~utensils~~ used for sanitary units shall be stored in a manner to prevent contamination when not in use ~~and only used for this purpose.~~”

Rationale: Prevent contamination from cleaning tools.

Poll Results: 57% in favor (23 total votes)

Questions/Comments:

Question: Is this for the contracted sanitation companies?

- *Response*: We meant it for everybody.

Comment: It seems like it should be a metric? at least the "segregate" portion?

- *Response*: We were just taking a step forward and getting people to think about it but will consider it.

Proposed Revision #44b: Equipment designated for cleaning/sanitizing in Best Practices (see page 78)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA’s proposed language - “Ensure that workers are trained regarding portable unit cleaning procedures ~~on concepts of tool separation and color coding.~~”

Rationale: Color coding is not used in the field.

Poll Results: 61% in favor (23 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #44c: Equipment designated for cleaning tools cleaning and storage in Best Practices (see page 78)

Proponent: CA LGMA

Proposed Revision: Revise AZ LGMA’s proposal - “If applicable, cleaning tools ~~utensils~~ used for sanitary units shall only be used for sanitary unit cleaning and shall be stored in a manner to prevent contamination when not in use ~~and only used for this purpose.~~”

Rationale: Changed language to be very specific to the sanitary unit being cleaned.

Poll Results: 73% in favor (25 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #45a and 45b: Harvest equipment storage and control procedures in Best Practices
(see page 78)

Proponent: AZ and CA LGMA's

Proposed Revision: CA LGMA proposes adding "When harvest equipment is not used, implement control and storage procedures that assure recleaning of equipment before its next use"

AZ LGMA proposes revising existing bullet, "Establish and implement equipment and supply storage and control procedures when not in use." by adding - "Indicate storage of harvest units when not in use and cleaning procedures prior to placing back into service before transporting to harvest or field location." to existing bullet."

Rationale: Broaden language to include distinction between harvest and field units while simplifying and clarifying.

Poll Results: 62% in favor (25 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #46a: Documentation and records in Best Practices (see page 78)

Proponent: AZ LGMA

Proposed Revision: Add new bullet - "Servicing records (either contracted or in-house) should be available for review to verify this is occurring according to SOP. Waste disposal shall be in accordance with all state and federal regulations and in an authorized location."

Rationale: Connect to SOP and add language for proper waste disposal.

Poll Results: 58% in favor (25 total votes)

Questions/Comments: There were no questions or comments with this proposal.

Proposed Revision #46b: Documentation and records in Best Practices (see page 78)

Proponent: CA LGMA

Proposed Revision: Removed AZ LGMA's proposal addressing waste disposal "Servicing records (either contracted or in-house) should be available for review to verify this is occurring according to SOP. ~~Waste disposal shall be in accordance with all state and federal regulations and in an authorized location.~~"

Rationale: Redundant with waste disposal covered in BPs of field and harvest personnel.

Poll Results: 54% in favor (25 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Issue 12: Equipment Facilitated Cross-Contamination (Field Sanitation)

Proposed Revision #47: Issue 12 introduction (see page 79)

Proponent: AZ LGMA

Proposed Revision: Revise existing language - “When farm equipment has had direct contact with raw untreated manure, untreated compost, waters of unknown quality, animals, [uncovered produce as defined in the PSR, excessive soil](#), or other potential human pathogen reservoirs it may be a source of cross-contamination. [If farm equipment comes into contact with a potential source of contamination, steps need to be set in place to address cleaning and sanitation to prevent cross-contamination.](#)”

Rationale: Reinforce language to place emphasis on farm equipment.

Poll Results: 67% in favor (23 total votes)

Questions/Comments:

Question: What is uncovered produce?

- *Response*: In the produce safety rule, you have covered produce and you have other things like potatoes. That’s the terminology that FDA uses – uncovered produce.

Comment: Please define excessive soil.

- *Response*: This is an opening statement and just a lead into best practices.

Question: Isn't this already in the metrics?

- *Response*: Yes.

Proposed Revision #48: Cross-contamination when moving farm equipment in Best Practices (see page 79)

Proponent: AZ LGMA; supported by CA LGMA

Proposed Revision: Add new bullet - “Allow adequate distance for the turning and manipulation of farm equipment to prevent cross-contamination from areas or adjacent land that may pose a risk.”

Rationale: Addresses risk of cross-contamination from regular farming equipment.

Poll Results: 58% in favor (23 total votes)

Questions/Comments: There were no questions or comments for this proposal.

Proposed Revision #49: SOP for cleaning and sanitizing contaminated equipment in Best Practices (see page 79)

Proponent: CA LGMA

Proposed Revision: Add a new bullet - “Develop an SOP that requires the re-cleaning and sanitation of any equipment that becomes contaminated with potential pathogens.”

Rationale: Although mentioned elsewhere in metrics, needed to be explicitly stated here.

Poll Results: 64% in favor (23 total votes)

Questions/Comments: There were no questions or comment for this proposal.