

April 23, 2021

Sonia Salas

Western Growers

15525 Sand Canyon

Irvine, CA 92618

RE: Leafy Greens Guidance Comments

Dear Ms. Salas,

Thank you for the opportunity to provide comments on the soil amendment/non-synthetic crop treatments section of the LGMA through the leafy greens review process. The Yuma Safe Produce Council was founded shortly after the 2006 Spinach Outbreak. Our main purpose at the time was to provide a network that would support the necessary training and education needed in order to implement the AZ LGMA metrics in our companies. Our continued purpose is to enhance food safety education in our community and among members by networking, increasing public awareness through media outlets, and maintaining a high understanding of current and ongoing research. Protecting the public’s health by providing safe quality produce is our focus. Our membership mainly consists of food safety professionals working for growers, harvesters, and shippers from the greater desert production area. Like Western Growers, the Yuma Safe Produce Council also supports the continuous improvement of the LGMA food safety guidelines and recognizes the benefits of having a systematic review process.

Soil amendments and crop inputs play a vital role in the production of leafy greens. The diversity among these products and the way they are used is vast. Safety is paramount and therefore, the Yuma Safe Produce Council would like to make the following comments for review and consideration:

1. Soil amendments and crop inputs are already regulated through government authorities, such as, EPA, FSMA-PSR, and CA Code of Regulations. LGMA metrics should align with existing regulations when newer, relevant and peer-reviewed research does not exist. Until knowledge gaps can be filled by research, growers should focus on the manufacturing process and process controls for these products. Furthermore, LGMA should follow, participate in, and support, to the extent possible, research pertinent to the safety of leafy greens.
2. The Council supports the inclusion of language that requires Signatories and/or Grower Food Safety Professionals review of supplier production information that relates to soil amendment and crop inputs safety annually. COA’s regarding LGMA acceptance criteria for fecal coliforms and pathogens of concern should be reviewed prior to application to the crop. Supplier documentation may include but is not limited to supplier letters of guarantee, SOPs for product processing, controls, sampling, storage and application. Only suppliers that are compliant with existing local, state, national, and meet the requirements of LGMA should be used for leafy greens production.

Thank you for all you do to support safe leafy greens. We look forward to participating in the upcoming webinars.

Sincerely,

Amanda Brooks, Mary Campbell, Vicki Scott, and Lupe Camarena

Yuma Safe Produce Council

Executive Board