



May 27, 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 Adjacent and Nearby Land use 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 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.

Regulatory investigations in recent outbreaks have been associated with adjacent and nearby land use. We understand that we cannot completely eliminate environmental sources that may impact the food safety of leafy greens production, but by conducting additional risk assessments and mitigations we can minimize the risk associated with adjacent and nearby land use. The Yuma Safe Produce Council would like to make the following comments for review and consideration:

1. Support the definition changes in the glossary.
2. Support the language changes and additions in table 7 that recommends an additional risk assessment to identify risks and mitigations.
3. Support the need for successful training to implement changes.

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