

# CA LGMA Priority Setting Report

## CA LGMA-Approved Guidelines 2025 Amendment Process

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March 10, 2025



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# Priority Setting Report

## Selected Priorities

The Priority Setting Committee (PSC), recommends the following priorities for 2025:

1. **Continuing the Water Section Review**

Continue the review of water, which started last year, with the following objectives:

- Simplify and clarify requirement language to enhance understanding.
- Assess the metrics from a scientific perspective and update requirements based on the latest scientific evidence.

2. **Formation of a Second Working Group**

Establish a second working group to meet monthly and evaluate improvements related to AZ and CA LGMA alignment. This group will address topics, such as audits and metrics, and will prepare a brief final report for the 2026 PSC outlining areas for possible improvement.

## Priority Setting Process

Western Growers (WG) supports the continuous improvement of the CA LGMA-approved leafy green food safety guidelines and facilitates a yearly systematic amendment process. The CA LGMA starts this process by confirming members of a Priority Setting Committee and ends it with the formal approval of the recommended priorities by the CA LGMA Board. The Priority Setting Process is the first step of the CA LGMA Guidelines amendment process. The goal of this process is to have a transparent selection of the topic(s) to be evaluated during the 2025 amendment process. The priority-setting process is split into the following steps:

1. Priority Setting Committee Selection Process
2. Priority Topic Submission
3. Meeting 1: Discussion of Submitted Priorities
4. Priority Voting
5. Meeting 2&3: Priority Selection
6. LGMA Board Priority Approval

## Step # 1: Priority Setting Committee Selection Process

The Priority Setting Committee was selected to include representatives from California and Arizona, with no more than one representative per member company.

The composition of the Priority Setting Committee was defined as follows:

### California

- Three members from the CA LGMA Technical Committee (volunteers). There were more than three volunteers, and the three spots were randomly selected. This is coordinated between LGMA Staff and the Chair of the CA LGMA Technical Committee.

One staff member from the CA LGMA

### Arizona:

- Three members of the AZ LGMA Technical Subcommittee. The selection was facilitated by the AZ LGMA during the February AZ LGMA Technical Subcommittee meeting.
- One staff member from the AZ LGMA .

Table 1: Priority Setting Committee

Name	Role/ Affiliation
<b>California</b>	
<b>Greg Komar</b>	CA LGMA Technical Director CA LGMA Staff
<b>Jake Odello</b>	Nunes Company CA LGMA Technical Committee Member
<b>Felice Arboisiere</b>	Dole Fresh Vegetables CA LGMA Technical Committee Member
<b>Thea Eubanks</b>	Organic Girl CA LGMA Technical Committee Member
<b>Arizona</b>	
<b>Kami Van Horn</b>	AZ LGMA Technical Assistant AZ LGMA Staff
<b>Megan Chedwick</b>	Church Brothers AZ LGMA Technical Subcommittee
<b>Matt Burke</b>	Tanimura & Antle AZ LGMA Technical Subcommittee
<b>Amanda Brooks</b>	Harrison Farms AZ LGMA Technical Subcommittee
<b>Facilitator</b>	
<b>Gustavo Reyes</b>	Western Growers Facilitator

## Step #2: Priority Topic Submission

The members of the Priority Setting Committee were requested to submit priority topics to be considered by the group. Priorities were submitted through an online form prepared by Western Growers. A summary of the submitted priorities is found in “Appendix 1: Summary of Priorities Submitted,” and the exact priorities and comments submitted are found in the supplemental document to this report. In addition, the CA and AZ LGMA requested their technical committees for additional priorities. Below are the priorities submitted for the group’s consideration:

### Priorities submitted by the CA LGMA Technical Committee

1. Harvesting Equipment Cleaning and Sanitation
2. Cleanup/ Amend Current Metrics
3. Take a Gap Year

### Priorities submitted by the Priority Setting Committee

1. Water
2. Audit Improvement
3. Harvesting Equipment Cleaning and Sanitation
4. Taking a Gap Year
5. Reviewing the LGMA Standards and Set Up
6. Tissue Sampling
7. Buffer Distances

### **Step #3: Meeting 1, Discussion of Submitted Priorities**

The Priority Setting Committee held its first meeting on February 19, 2025. During the one-hour meeting, the topics identified in Step #2 were reviewed and the following priorities were grouped and selected for voting. The points listed under each priority summarize the discussion from the meeting:

#### **1. *Water***

- Focus on well remediations and understanding well sampling strategies when issues arise.
- Water treatment, DTH window need to be revised, also testing frequencies .
- Simplification of water-related metrics to improve clarity.
- Identification of non-conformance issues in agricultural water assessments and records.
- Well assessment .
- Acknowledgment of the challenges of ag water rule/ ag water assessment and the need for better clarity in metrics.

#### **2. *General Metrics Update***

- Audits: Simplifying metrics- to help streamline auditing processes.
- Importance of a fundamental review of metrics from the start, ensuring they remain relevant. This could remove subjectivity from audits.
- Complete the refresh before adding more items to the current metrics.

#### **3. *Harvesting Equipment***

- It may not make sense to proceed with revision of the metrics as changes are coming in 2026 and 2028.
- LGMAs are piloting new sanitation training next week to evaluate effectiveness.
- A lot more will be done with this topic in the coming years.

#### **4. *Take a gap year***

#### **5. *Tissue sampling***

- T&L program may allow us to make changes in this area.
- Current metrics have testing requirements as part of the water section (remediations).
- Current testing standards are in the appendix C (based on uniform, 1 CFU/lb. contamination)

#### **6. *Buffer Distances***

- CA Longitudinal study coming out later this year could inform some of these areas.

## Step #4: Priority Voting

The Priority Setting Committee was sent an online survey to vote for each priority based on two criteria: (i) Urgency, and (ii) Impact. The priority score was calculated by multiplying the urgency and impact scores selected. Scores were obtained by using the following priority matrix:

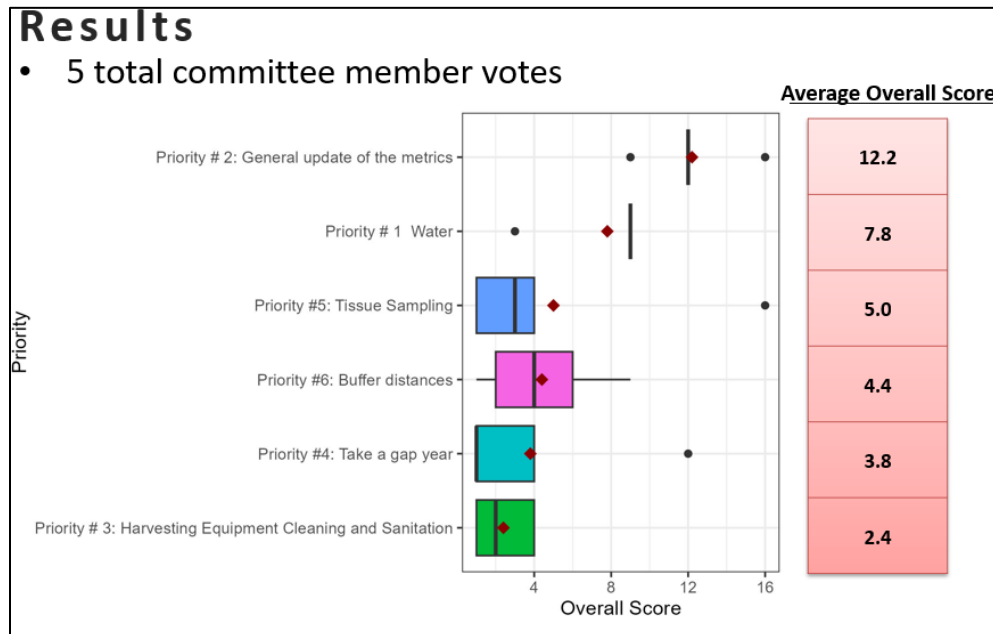
Table 2: Priority Matrix

		Impact			
Urgency		1 Lower	2	3	4 Higher
	1 Minor	1	2	3	4
	2	2	4	6	8
	3	3	6	9	12
	4 Critical	4	8	12	16

A total of five members voted for each priority. The average priority score was obtained by each priority following the equation below, where the average priority score was used to rank priorities from 1 to 6. The rank and boxplot of the priorities are displayed in **Figure 1**.

$$\text{Average Priority Score} = \frac{\text{sum of all 5 priority scores}}{5 \text{ votes}}$$

**Figure 1:** Results from the priority setting process voting.



**Figure 1:** Summary of average overall scores for six priorities considered by the Priority Setting Committee.

The results of the priority survey indicated that the priority with the highest average overall score was priority #2, General update to the metrics, with a 12.2 average priority score. The second-highest was Priority #1, Water, with 7.8 points.

## **Step #5: Priority Selection**

### **Meeting 2: Result Discussion and Refinement**

On February 21, 2025, the working group held a second meeting, where the results from the voting were presented. Following the presentation, the working group was asked to further refine and discuss the needs under priority #2: General update of the metrics. Below is a summary of the main areas discussed during the meeting.

It is worth mentioning that this meeting has highlighted the need for the LGMAs to further review other topics (audits) that are beyond the scope of this process. This comes to play as part of the creation of the **“Second Working Group.”**

Major themes identified during this first meeting were:

- **Audit Process and Efficiency** – Concerns raised about the length and inefficiencies in the auditing process, particularly in documentation review.
- **Standardization Across California and Arizona** – Need for more alignment between the two LGMA programs to improve consistency and reduce redundancy.

The following areas for improvement were identified during the second meeting:

- **Gap Analysis Using Audit Data:**
  - Look at the most common non-conformances and assess whether they stem from unclear metrics or actual industry challenges.
  - Determine whether training, metric simplification or enforcement changes are needed.
- **Audit Process Streamlining:**
  - Reduce redundant document reviews, particularly for long-established procedures.
  - Explore pre-approval for common vendors to minimize unnecessary audit steps.
  - Ensure that any changes to the metrics do not introduce new complexities in the auditing process.
- **Metrics Structural Review:**
  - Determine if the way the metrics document is structured can be improved for clarity and usability.
  - Identify areas where requirements could be eliminated or combined to simplify compliance.
- **Scientific Review of Key Areas:**
  - Prioritize sections of the metrics that have not been reviewed in years, such as buffer distances and water testing.
  - Engage researchers and subject matter experts to assess whether standards remain scientifically valid.
- **California-Arizona Alignment:**

- Work toward full adoption of the Smarter Audit process in both states.
- Ensure both LGMA programs use consistent audit checklists and reporting methods.

Consensus was not reached during this meeting. Facilitator Gustavo Reyes suggested having a third meeting where the group would be presented with a proposal based on the discussion help during meeting #2. The PSC asked to review AZ and CA LGMA audit data to understand which areas of the Metrics had the most deviations and why deviations occurred.

### **Meeting 3: Audit Data Review and Priority Selection.**

A third meeting was held on March 3, 2025. During the meeting, AZ and CA LGMA staff provided deviation data. This preliminary information was used for the PSC to select the priority topic for 2025 with the goal of improving the language in the metrics. The review highlighted concerns related to water requirements. Additionally, the review highlighted areas where AZ and CA could better align their audit process through Metrics improvement.

To address these two areas of concern from the Audit data review, the PSC recommended:

#### **1. Continuing the Water Section Review**

Continue the review of water, started last year, with the following objectives:

- Simplify and clarify requirement language to enhance understanding.
- Assess the metrics from a scientific perspective and update requirements based on the latest scientific evidence.

#### **2. Formation of a Second Working Group**

Establish a second working group to meet monthly and evaluate improvements related to AZ and CA LGMA alignment. This group will address topics, such as audits and metrics, and will prepare a brief final report for the 2026 PSC outlining areas for possible improvement.



# Appendices

## Appendix 1: Summary of Priority Topic Submitted

Recommendation	Justification
<b>CA LGMA Technical Committee Submissions</b>	
<b>Harvesting Equipment</b>	High risk due to the potential for cross contamination.
<b>Cleanup/Amend current metrics</b>	All the ads have made the metrics subjective Before proceeding, the group should clean and amend the metrics.
<b>Take a Gap Year</b>	
Recommendation	Justification
<b>Priority Setting Committee Submissions</b>	
<b>Water related</b>	<p>Currently a lot of time, effort and money is going into meeting the LGMA water treatment requirements. I think additional precautions, such as the 21 DTH window, sampling two times within the same month, etc. were required based on "more is better" in trying to quickly create updated metrics, but now a few years later it would be good to verify our metrics to see if they're still the correct metrics and change where needed.</p> <p>Began process last summer but realized it was too big to tackle, and we needed more time.</p> <p>Continue to simplify water metrics and update the science.</p> <p>Water is a point of widespread contamination.</p>
<b>Audit related</b>	<p>While it's the goal, the LGMA is not the one and only audit, and I'm not sure it never will be as we still have to comply with PSR and PrimusGFS and receive those additional audits regarding if we're an LGMA member or not. That said, I think we need to review the requirements and audit checklist to see what is really the most important and of other things aren't as important consider to remove. Audit fatigue, cost of multiple audits, etc. should be factors for consideration.</p> <p>I think this is on everyone's mind. How can this review process help make smarter audits a reality?</p> <p>The two programs are diverging. Take CA's Smarter Audits program, which will make the two more dissimilar. The checklists and audit execution are different.</p>
<b>Harvesting Equipment Cleaning and Sanitation</b>	Align with California as much as possible and make recommended updates. Equipment is a touch point for cross contamination.
<b>Take a gap year</b>	The LGMA has a strong process of reviewing and updating metrics annually. Over the last few years, that has allowed the LGMA to address, create and implement standards for food safety industrywide, which has been lauded and is unique within the food manufacturing space. I would propose that this year, the LGMA take the time to address and finish anything pending and put a strong focus on ensuring there are effective tools, processes and education to meet the current standards without having to already work on something new. This committee proposed, wrote and implemented cleaning and sanitation practices last year, and the training that is required will be launched at the end of February, most likely after the work of this committee is completed. Thus, we will have set

	<p>priorities for updated metrics and/or work for this year without having even started the implementation work from last year. I encourage my fellow committee members to take a step back and consider the idea of maybe needing a gap year to ensure effective implementation of the important work this group has done in the past.</p>
<b>Review standard and set up</b>	<p>Right now, the LGMA is a grower-based program, but it's set up as a handler-based program. The auditing process would be much more efficient if it targeted growers for audits vs. handlers. This would be more like a PrimusGFS audit, which is completed by the growers and then shared to the shippers. This would be potentially more time efficient and cost-effective.</p>
<b>Tissue Sampling</b>	<p>Need to harmonize sampling procedures. Are they based in science, customer requirements or politics?</p>
<b>Review of buffer distances</b>	<p>Outside of CAFOs, the buffer distances have remained the same for many years. Additionally, you have customers who have created their own buffers. An additional scientific review to ensure the buffers are still accurate and sufficient would be helpful to help customers feel confident that the science supports their adequacy or indicates if changes are needed based on current research.</p>

## Appendix 2: Memo to the Board

March 10<sup>th</sup>, 2025

To: California LGMA Advisory Board

From: California LGMA Priority Setting Committee

Re: Proposed Priority/Priorities for the LGMA Metrics Review

Dear Board Members,

The Priority Setting Committee (PSC) met in February and March to select the priority for 2025. The Priority Setting Committee followed the priority setting process by reviewing submitted priority areas, voting on these priority areas, and defining the scope for said priority.

The PSC reviewed multiple submissions for priorities:

- |                           |                      |
|---------------------------|----------------------|
| 7. Water                  | 10. Take a gap year  |
| 8. General Metrics Update | 11. Tissue sampling  |
| 9. Harvesting Equipment   | 12. Buffer Distances |

The top priority identified was Priority #2: General Metric Update. After selecting this priority, the PSC asked to review AZ and CA LGMA audit data to understand which areas of the Metrics had the most deviations and why deviations occurred. Specifically, the PSC committee was interested in understanding where metrics language may be unclear leading to non-conformances. In a subsequent meeting, Alyssa Villar and Kami Van Horn presented deviation data to the PSC highlighting areas of the Metrics that may be unclear. The review highlighted concerns related to water requirements. Additionally, the review highlighted areas where AZ and CA could better align their audit process through Metrics improvement.

As a result, the PSC recommends:

**3. Continuing the Water Section Review**

Continue the review of water, started last year, with the following objectives:

- Simplify and clarify requirement language to enhance understanding.
- Assess the metrics from a scientific perspective and update requirements based on the latest scientific evidence.

**4. Formation of a Second Working Group**

Establish a second working group to meet monthly and evaluate improvements related to:

- AZ and CA LGMA metrics alignment.
- Improvement to the audit process
- Additional topics identified by the group that will result in the improvement of the LGMA metrics.

This group will prepare a brief final report for the 2026 PSC outlining areas for possible improvement.

Sincerely,  
CA LGMA Priority Setting Committee



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