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# CA LGMA Test & Learn Final Report

## CA LGMA-Approved Guidelines 2025

### Amendment Process

October 2<sup>nd</sup> 2025

# *CA LGMA Priority Setting Report*

Topic Discussed in this report:

CA LGMA Test & Learn Program

Prepared by:

Western Growers for the California Leafy Green Marketing Agreement

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## CA LGMA Test & Learn Final Report

### Background

Since the inception of California's Leafy Green Handlers Marketing Agreement (CA LGMA), Western Growers (WG) has facilitated a systematic amendment process to update the CA LGMA-approved guidelines (also known as the LGMA metrics).

### LGMA 2025 Amendment Process Summary – T&L Program

**Priority:** The Test & Learn topic was not part of the priority setting process in 2025. Instead, this was a special topic taken up during 2025. The CA T&L Program started in October 2025, and its original length was intended to be 2 years, concluding on September 29<sup>th</sup>, 2025. As a result, the CA LGMA, and the Test & Learn data governance group conducted a series of meetings during the summer of 2025. The goal of these meetings was to discuss the findings of the program and make recommendations to the CA LGMA Technical Committee and Board about the future of the program.

In July 2025 the CA LGMA Board voted to continue the program for two additional years, as well as collect additional parameters that the Test & Learn Data Governance Team Recommended.

As these changes were approved, section 17 of the CA LGMA guidelines must be updated. To update the guidelines the amendment process had to be initiated. The process was initiated in August 2025.

**Working Group:** Following the priority-setting process (special as described above), the Working Group was created. In this situation the data within the program is extremely confidential. The Working Group was composed of those who are familiar with the data and the program, the DG group and subsequently the working group met on two occasions during the month of August two discuss updated to the language of the guidelines to match the changes approved by the CA LGMA Board.

**Open Comment Period:** Following the working group process, a 30-day comment period was opened for external parties to submit comments on the language proposed by the working group and/or propose changes to that language. These proposals and supporting documentation are made publicly available on the [www.leafygreenguideance.com](http://www.leafygreenguideance.com) website. The comment period started August 18<sup>th</sup> and ended September 18<sup>th</sup>. No comments were received. The comment period was announced numerous times through the Western Growers Science Newsletter and the Western Growers Newsletter Spotlight, similarly the CA LGMA shared the announcement with their membership

**Webinar:** Approximately a week after the comment period closed (September 25<sup>th</sup>, 2025), WG hosted a webinar. During the webinar, the process was reviewed, the LGMA presented the working group's proposed changes. As no comments were received no comments were shared. Instead a Q&A session was held

**Working group final proposal development:** This step was not taken as no additional comments were received.

# CA LGMA Priority Setting Report

**Reporting:** Following the webinar, WG submits this report to the CA LGMA capturing the original proposal, public comments and revisions, and feedback during the webinar.

## Working Group Process

### Working Group Members - Harvesting Equipment Sanitation

Three working groups were created to address the three priority areas identified above. The process started in August 2025, and two meetings were held to discuss changes.

Table 1. T&L Working Group Members

T&L Working Group	
Working group member	Affiliation
Ron Ratto	The Nunes Company
Jake Odello	Ratto Brothers
Joelle Mosso	Western Growers
Drew McDonald	Taylor Farms
Gurmail Mudahar	Tanimura & Antle
Megan Chedwick	Church Brothers
Barbara Kowalcyk	George Washington University

Table 2. Staff and Representatives

T&L Working Group	
Working group member (Staff)	Affiliation and Role
Greg Komar	CA LGMA - CA LGMA staff
Connie Quinlan	CA LGMA - CA LGMA staff
Tim York	AZ LGMA – AZ LGMA staff
Gustavo Reyes	Western Growers – Drafting and facilitation

# CA LGMA Priority Setting Report

## Summary of Updates

The working group worked on developing an initial proposal to submit to the comment period.

A summary of the topics that were added or modified in this proposal is below:

### 1. Introductory Section

- Clarified programming language for better understanding.
- Updated time for the program.
- Clarified who submits data (responsibility now explicit).

### 2. Best Practices for Sampling & Testing

- Data sources updated to match program requirements.
- Timeline removed, as it is already defined in the introduction.
- Sampling method details removed – now reported as a submitted variable.
- Both pre-harvest and post-harvest samples must meet a minimum 375g weight requirement.

### 3. Best Practices for Reporting Data

- Removed Excel submission requirement – now replaced by API and lab report submissions.
- Added required data parameters:
  - Sample ID
  - Grower
  - Ranch
- Removed Region (redundant, since Grower + Ranch suffice).
- Standardized method of reference and test results.
- Introducing new required forms:
  - Ranch Form
  - Method Verification Form

### 4. New Required Forms

- Romaine T&L Ranch Form
  - Submitted once per Ranch x Grower combination (annually or when updated).
- Romaine T&L Method Verification Form
  - Describes testing methods used by labs.
  - Submitted annually or when changes occur.
  - To be completed by handlers in collaboration with labs.
- Root Cause Analysis (RCA) Form (for every positive result):

## Comment Period and Webinar

On August 18<sup>th</sup>, Western Growers opened a 30-day comment period regarding changes to Issue 17 of the metrics. Interested parties could submit their comments and proposed changes through the [www.leafygreenguidance.com](http://www.leafygreenguidance.com) website.

Following the comment period, WG hosted a webinar on September 25th, 2025. The goals for the webinar were (i) for the CA LGMA to share a summary of the proposals submitted by the working groups, and (ii)

to provide those who submitted comments an opportunity to share a summary of the comments submitted.

No comments were received during the Webinar

The webinar was moderated by Gustavo Reyes from Western Growers.

## Final Steps

Following the comment period this report, the clean version of the updates, and the marked up version of the updates were sent to the CA LGMA.

- On October 3<sup>rd</sup>, 2025, the technical committee will review the changes and provide a recommendation to the board
- In an upcoming meeting the CA LGMA Board will vote to approve the updates
- Once updated Western Growers provides a final draft to the LGMA for Approval.

## Supporting Documents

- Memo from the Working Group
- Marked Up Version of Issue 17
- Clean Version of Issue 17

## Supporting Memo from the working group (Posted online August 18<sup>th</sup>)

The LGMA Test & Learn (T&L) Working Group, comprised of members from the LGMA T&L Data Governance Group, recommends updating the CA LGMA metrics (leafy green food safety guidelines) to incorporate the recently approved enhancements to the Romaine Test & Learn Program. These updates reflect both the program's two-year extension and the introduction of new data reporting requirements aimed at deepening insights and improving industry-wide learning.

### Background

The original timeframe for the CA LGMA Romaine Test & Learn (T&L) Program was scheduled to conclude in October 2025. The LGMA T&L Data Governance Group met during June and July 2025 to review program results and identify opportunities to maximize learnings.

Based on these discussions, the CA LGMA Board approved on **August 7, 2025**, an extension of the program for an additional two years (through September 30, 2027) and the adoption of updated requirements reflected in Issue 17 of the metrics. This proactive step will allow continued data collection and deeper analysis to strengthen industry knowledge.

### Program Changes:

Along with the extension, LGMA is introducing new data reporting requirements. These updates are designed to improve the understanding of key associations identified upon initial analysis of the data. To reflect these changes, Issue 17 of the metrics needs to be updated; this comment period is intended to gather feedback on the drafted language of the updated program.

The program remains voluntary and applies only to handlers who are already testing romaine. The new requirements will apply exclusively to those participants.

Find below the following information:

- LGMA Approved Food Safety Guidelines – Issue 17 Draft
- Romaine Test & Learn Annual Ranch Information Form
- Romaine Test & Learn Annual Method Verification Form
- Romaine Test & Learn – Sample Upload Template for Every Sample
- Romaine Test & Learn – Root Cause Interview Recommendations



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