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RE: Leafy Greens Guidance Comments

Thank you for the opportunity to provide comments on the water section of the LGMA metrics through the leafy greens review process.

The Yuma Safe Produce Council (YSPC) was founded in 2006 with the primary purpose of creating a network to support the training and education necessary for implementation of the Arizona LGMA metrics within our member companies. Today, our mission continues to focus on strengthening food safety education throughout our community and among our members through collaboration, professional networking, public awareness, and maintaining a strong understanding of current and emerging research. Protecting public health through the production of safe, high-quality produce remains our highest priority. Our membership is comprised of food safety professionals representing growers, harvesters, and shippers throughout the greater desert production region. Like Western Growers, the YSPC supports the continuous improvement of the LGMA food safety guidelines and recognizes the value of a systematic and science-based review process.

Guidelines for ensuring that agricultural water is safe for its intended use are a critical component of the LGMA metrics. Since the inception of the LGMA, the water section has undergone numerous revisions, underscoring both the importance of this area and the industry's commitment to producing safe food. The YSPC respectfully submits the following comments for consideration.

4. Personal Qualifications and Training

YSPC supports the changes to this section with the following recommendations in red. We encourage the work group to consider limiting this training to those individuals conducting on farm assessments. Ag Water Assessments are required of third party suppliers, however, it is ultimately the responsibility of the grower/shipper to review and approve the third party supplier's assessment.

> For personnel conducting on farm agricultural water assessments, training must be completed, and the training program must address the following minimum requirements:
>
> - When an agricultural water assessment should be completed.
> - How to conduct an agricultural water assessment or risk assessment.
> - Potential hazard and risk identification for both surface and ground water sources.
> - Assessment of well integrity and above ground components.

- Monitoring practices, including microbiological testing, and residual monitoring.
- Water treatment system set-up, corrective actions, and best practices.
- Mitigations and corrective actions including follow- up testing, level 1 assessments, well chlorination, and when preharvest product testing is needed.
- Review of third party supplier Ag Water Assessments.

6.3 Management of Private Wells

Yuma County faces significant practical limitations in accessing qualified professionals with expertise in agricultural well systems, as distinct from domestic well infrastructure. The professionals with the appropriate technical background to evaluate agricultural wells are the same specialists currently responsible for new well development, repairs, and infrastructure maintenance—services that are already experiencing substantial backlogs across the region.

The proposed requirement outlined in the *LGMA Water Metrics Update – Rationale Document for Major Updates*, Section 6.3 *Management of Private Wells*, bullet point 3, which states that *"Every private well must be inspected by a certified professional once every five years to ensure integrity of the components both above and below ground,"* presents significant operational and financial challenges for growers, particularly in low-risk agricultural production environments such as the desert Southwest.

For many operations, existing water management programs already include rigorous risk mitigation measures, including structured environmental assessments, ongoing microbial testing, corrective action protocols, and compliance with current LGMA agricultural water standards. Requiring mandatory five-year professional inspections for all private wells, regardless of demonstrated performance history or risk profile, represents a broad prescriptive approach rather than a science-based, risk-based framework. This also is another cost that growers must absorb without substantial proof of necessity.

We recommend that professional well inspection requirements be triggered by documented indicators of elevated risk, such as repeated failure to meet proposed microbial water quality thresholds (including generic *E. coli* and coliform parameters) despite implementation of corrective actions such as disinfection and system remediation. This targeted approach would better align regulatory oversight with actual food safety risk. When a professional well inspection is warranted, larger volume sampling such as the proposed 1L membrane filtration, is justifiable to bring the system back into Type A status.

Additionally, in many desert-region agricultural operations, groundwater extracted from private wells is conveyed through secondary infrastructure (ie open canals and ditches) prior to entering the crop production environment. Under current LGMA metrics, this water is deemed Type B and treated accordingly within existing food safety protocols. Similar scenarios exist where water for other agricultural uses (ie chemical applications, handwash, or equipment cleaning) is sourced from a private well and additional treatment such as reverse osmosis is applied. This distinction

should be recognized in the proposed framework, as these systems already incorporate additional risk mitigation measures prior to contact with the crop or food contact surfaces.

We encourage the workgroup to review inclusion of total coliforms for private well acceptance criteria for applicability. We understand this to come from the EPA Revised Total Coliform Rule, however, private wells for agricultural irrigation are not public water systems - the utilities covered under the Revised Total Coliform Rule.

The YSPC supports changes to this section that are science-based and protect public health while remaining operationally practical, regionally appropriate, and proportionate to measurable risk.

6.7 Irrigation Water Treatment Systems Management and Table 2D: Irrigation Water from Treated Type B → A Agricultural Water Systems

YSPC members have been implementing water treatment programs under the existing LGMA metrics for more than seven years and, through extensive training, collaboration, shared learning, and operational experience, have developed highly effective systems and practices.

Our general assessment of the proposed revisions is that they do not substantially increase food safety protections, but rather provide operational refinements that better align with how industrial water treatment systems are commonly managed and monitored. We appreciate the SMEs' recommendation to move toward "more consistent and operationally relevant monitoring of treatment systems." In many cases, our members are already conducting much of the proposed residual monitoring, although in a less prescriptive manner.

However, the proposed changes would require significant operational adjustments, including revisions to SOPs and additional employee training, and would likely result in an increase in initial audit deviations, with limited corresponding food safety benefit.

For these reasons, our recommendation to the workgroup is to require residual monitoring at a minimum frequency while otherwise maintaining the majority of the existing water treatment framework. As a suggestion, we offer the following language in red for inclusion in the "Best Practices for Managing Irrigation Water Treatment Systems" and Table 2D.

Best Practices for Managing Irrigation Water Treatment Systems

- The minimum best practice for managing irrigation water treatment are outlined below and must be completed. For greater detail refer to appendix A.
- Before using treated water to irrigate crops within the 21 days-to-scheduled-harvest timeframe producers must first establish SOPs outlining irrigation treatment and process parameters for irrigation treatment systems unless duplicated systems are in use. (This bullet is moved up for better flow)

- Prior to 21 days-to-scheduled-harvest conduct an initial irrigation water treatment assessment to establish treatment process parameters that will be monitored to ensure consistent treatment delivery and to demonstrate its effectiveness as described in Appendix A.
    - At a minimum, for chemical treatment, process parameters must include chemical residuals.
    - Repeat this assessment if a material change (eg change in equipment or type of water treatment) to your system occurs.
- Confirm that water microbial quality is not being degraded as it passes through each of your water treatment systems (ie due to equipment conditions) by performing a microbial water quality assessment during an irrigation event before entering the 21 days-to-scheduled-harvest timeframe.
    - Collect three 100 mL samples from 3 ~~different~~ sprinkler heads with at least one sample from the farthest/last sprinkler head. Acceptance Criteria and Data Monitoring Criteria as outlines in Table 2D- Routine Monitoring of Microbial Water Quality must be met.
- When your system is in use within 21 DTSH, follow Table 2D for routine verification and monitoring of water treatment.

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Table 2D

D2. Routine Monitoring of Water Treatment	
Antimicrobial water treatments - USEPA-approved for use in agricultural water; for non-chemical treatment options (e.g., physical or UV) conduct microbial testing for routine monitoring. **Target variable:** Antimicrobial irrigation water treatment or manufacturer's operational specifications (e.g., per manufacturer's recommendations, chemical concentration, etc.).	

Testing Procedure:
After the system has stabilized, at a minimum conduct three (3) residual tests, with at least one from the end of the system using:
• Chemical reaction-based colorimetric test, or
  • Ion-specific probe, or
  • Other as recommended by antimicrobial chemical water treatment supplier or manufacturer's specifications.
 	
Collect and record residual tests as per your SOP to verify parameters established for the water treatment system are being met.
 	
Testing Frequency:
Monitoring must be conducted during each irrigation event when the treatment system is in use within 21 DTSH and per
	Whenever your system is in use, ongoing monitoring is conducted to ensure that your system is working correctly.
	
	Follow the manufacturer's label or operational instructions when ~~M~~monitoring the efficacy of the water treatment method ~~per the manufacturer's label or operational instructions~~. Treatment must be delivered in a manner, and monitored at a frequency adequate, to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use. Use the SOPs created during the initial assessment.
	
	During each water treatment irrigation event, to demonstrate the irrigation system is performing as intended, document:
	• Flow rates
	• Treatment-related parameters such as residual

company SOP. ~~Monitoring must be conducted during each irrigation event when the treatment system is in use within the 21-days-to-harvest window. Monitor by measuring residuals at a frequency adequate, to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use.~~ * For monitoring non-chemical treatment options (e.g., physical or UV) conduct microbial testing (per section D5. Routine verification of the distribution system).	antimicrobial levels, pH, dose settings, UVT, etc. ~~If water quality falls outside the acceptable monitoring parameters, conduct microbial testing per section D51. Routine Verification of~~ If monitoring shows that the water treatment parameters are not being met, *do not use the water.* ▪ Perform a corrective action to assure the water treatment is effective before using the water. ▪ If deemed necessary, conduct microbiological testing per section D5 to verify that the treatment was effective and have that result as part of the corrective action documentation. ▪ If the verification microbiological sample does not meet acceptance criteria, perform a root cause analysis and correct the treatment process. Product must be tested for pathogens before harvesting. Follow Table 2F for product testing requirements.
Test Method: Per label instructions	
Records: During every irrigation event, ~~treatment-related parameter values such as~~ residual antimicrobial levels (for chemical treatments), and other treatment-related parameter values (e.g., pH, dose settings, UVT, etc.) must be documented to demonstrate the system is working as intended. Each water sample and analysis shall record the type of water source, date, time, and location of the sample, the method of analysis, the measured values, and, if applicable, the detection limit. All test results and remedial actions shall be documented and available for verification from the grower/handler who is the responsible party for a period of two years.	

Table 2D- D6. When Adding Crop Nutrients and/or Crop Protection Materials within 21 DTSH

This section of Table 2D has been in the AZ LGMA metrics for several years. Our members support adding it to the CA document as it provides options for growers to comply with label requirements and chemical incompatibility concerns. We encourage the workgroup to review the pre-harvest product testing requirement. Current metrics require risk-based protocol, and we feel it is worth having a discussion on allowing industry standard testing.

The YSPC appreciates the efforts of Western Growers, the subject matter experts, and workgroup participants throughout this review process. We value the forward-thinking approach reflected in

these proposed updates and believe many of the recommendations pertaining to B to A water treatment will become increasingly achievable as treatment technology and system connectivity advance.

Our comments are focused on being operationally practical, risk-based, and science driven. Thank you for your consideration.

Sincerely,
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