



May 31, 2022

Sonia Salas
Western Growers
15525 Sand Canyon
Irvine, CA 92618

RE: Leafy Greens Guidance Comments

Dear Ms. Salas,

Thank you, once again, for the opportunity to provide comments through the LGMA review process on the subject of pre-harvest testing. 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.

Pre-harvest testing is an important food safety tool that is used by many in the industry. It is imperative that producers of leafy greens have tools that prevent potentially contaminated produce from entering the marketplace. As food safety professionals, we are keenly aware of the challenges working in an open environment creates. We must be able to adapt to changes in the environment. Identifying hazards and assessing risk are the primary role of the food safety professional and should drive our actions. For this reason, we support pre-harvest testing in specific situations and request the LGMAs consider the following:

- **For cause testing applying to all leafy greens.** Produce potentially contaminated with known or reasonably foreseeable hazards should require testing or not be harvested. Some situations, for example water treatment failure or proximity to animal operations, present a higher inherent risk and therefore pre-harvest testing should be conducted.
- All producers should have **standard operating procedures** for pre-harvest testing. SOPs may vary from company to company, however minimum requirements should exist when hazards/risks are identified.



- **Additional training** in the areas of identifying hazards, performing risk assessments, and conducting pre-harvest testing will benefit LGMA members. Training will help advance knowledge and understanding for handlers of leafy greens, especially those conducting hazard/risk assessments. For this reason, we strongly encourage LGMA provide additional training opportunities.
- **Gathering of information** through voluntary means should be encouraged. The LGMAs rely on research and industry groups to inform best practices. The YSPC has provided Western Growers an opportunity to inform our members about your data sharing platform. We are excited and encouraged to hear others are working on similar projects because these efforts will provide valuable information. It will also allow for the ability to protect information and maintain confidentiality.

Like Western Growers, 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. Unlike prior review periods, this time we did not have a document to comment on however we look forward to making additional comments when that becomes available.

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

Sincerely,

Amanda Brooks, Mary Campbell, Vicki Scott, and Lupe Camarena
Yuma Safe Produce Council
Executive Board