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**ARIZONA LEAFY GREENS TECHNICAL SUBCOMMITTEE**

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August 1st, 2023

**Re: Arizona Leafy Greens Technical Subcommittee public comments on Flooding and the Romaine Testing & Data Analysis Program**

The Arizona Technical Subcommittee (TSC) met on August 1st, 2023 to review the proposed changes to the Issue 12: Flooding section. After the California flooding events of 2022-2023 a thorough review of the current metrics was warranted. The TSC is supportive of data driven changes to this section. However, the TSC has not been provided with the research data that supports the changes presented and would like more information on how these recommendations were determined. Additional information will provide the TSC the information needed to determine whether the changes are appropriate for the Arizona growing regions. Additionally, we are unaware if research or data exists with regard to *generic E. coli* levels in Arizona soils and would like time to review what levels are appropriate for these soils.

The TSC also reviewed the updated Romaine Testing & Data Analysis Program and while we feel data can inform decisions moving forward, we stand by our comments made previously and as recent as February 14th, 2023.

Arizona would like to ask that the CA LGMA metric changes include a Pre-Harvest Testing policy as was revised in Version 15 of the Arizona LGMA metrics to help continue alignment between the two LGMA programs. This would require that a Standard Operating Procedures be developed to address conducting any pre- or post-harvest testing (Arizona LGMA metric line #286-306).

* *Develop a pre-harvest testing SOP. When deciding on sampling plans, see Appendix C for sampling plan options and recommendations. The SOP must address the following minimum requirements:*
* *All lettuce and leafy green commodities. If testing programs differ by commodity, outline in the SOP.*
* *Sampling timeline. An interval closer to estimated harvest date is considered a best practice.*
* *Target organisms. Test for E. coli O157:H7, STEC/EHEC, and Salmonella.*
* *Sampling lot size. Sampling lot size may decrease when risk is elevated.*
* *Sample size.*
* *Number of grabs. More individual grabs per lot improves the probability of contamination detection.*
* *Sampling method. Laboratories used for analytical parameters must be certified and/or accredited by recognized State, Federal, or international bodies (ISO) for the analytical methods being reported and the matrices being analyzed.*
* *Risk considerations, including when a sampling plan should be more stringent based on the identified risk.*
* *Develop a test and hold policy.*
* *Corrective measures to be taken when positive samples are detected.*
* *Records review and documentation*
* *Samples must be taken by a trained sampler. If utilizing in-house samplers, implement mandatory training on the sampling protocol for personnel conducting pre-harvest product testing.*
* *If a positive test result is reported,* ***do not*** *harvest the sampling lot. Determine if further investigation and root cause analysis (RCA) is of value based on observations and elective follow-up sampling. Utilize industry guidance1 on how to evaluate the value of and conduct RCA activities.*

Additionally, we would like to request that CA LGMA require all members to conduct pre-harvest product testing on any lettuce or leafy green when a risk assessment deems it necessary (Arizona LGMA metric line #285).

To further address alignment of the LGMA’s we recommend that CA LGMA adopt training requirement for individuals conducting environmental hazard and risk assessments (Arizona LGMA metric line #191-199). The TSC would like to ask that these metrics be updated to reflect that change as well. This Environmental Assessment training program must address the following minimum requirements:

* *When an environmental hazard or risk assessment should be completed*
* *How to conduct an environmental hazard or risk assessment*
* *Potential hazard and risk identification*
* *Recognizing product that may be contaminated with known or reasonably foreseeable hazards*
* *Mitigations and corrective actions*
* *When an environmental hazard or risk assessment deems pre-harvest product testing is necessary*

The TSC appreciates the openness and transparent review of the metrics that the Western Growers process allows. We also appreciate the opportunity to comment on the issues presented now. We look forward to following and learning from the Romaine Test & Learn program and hope moving forward the data acquired will make our metrics stronger.

Thank you,

Arizona Technical Subcommittee