HOW THE LGMA ALIGNS with the Food Safety Modernization Act (FSMA) REQUIREMENTS

2011 | President Obama signed the Food Safety Modernization Act (FSMA) into law, the first major update to federal food safety laws in some 70 years. A major part of FSMA is the Produce Rule, which will establish - for the first time - on-farm food safety practices that farmers of fresh produce crops must follow to reduce the risk of contamination by foodborne pathogens.

2007 | Leafy greens farmers and handlers in California and Arizona began operating under the California and Arizona Leafy Greens Marketing Agreements. These industry-driven organizations operate with oversight by their state governments to verify through government audits that leafy greens farmers are following a set of science-based food safety standards.

The food safety practices being followed by leafy greens farmers in California and Arizona are focused on the same risk areas identified in FSMA and will meet or exceed the requirements proposed in the Produce Rule.

**TRAINING**

**FSMA PRODUCE RULE**
The Rule will require training for farm personnel who handle produce or food contact surfaces, and for supervisors.

**LGMA METRICS**
The Metrics define the “food safety professional” each company must employ, and requires training in specific standards for all farm employees involved in growing, harvesting and packing leafy greens. The Arizona and California LGMAs are expanding their training programs in order to fully comply with the FDA’s requirements under the Produce Rule.

**AGRICULTURAL WATER**

**FSMA PRODUCE RULE**
The rule would require that agricultural water be safe and of adequate sanitary quality for its intended use. It proposes development of water quality profiles and specific testing criteria for agricultural water, which is water that is “intended to, or likely to, contact covered produce or food contact surfaces.”

**LGMA METRICS**
The Metrics require monthly testing and provide specific standards for water that is used directly on crops meet those proposed under FSMA. In addition, the Metrics include standards for all other water used in the production of leafy greens, including water not intended to contact the edible portions of the crop.
FSMA PRODUCE RULE
The Rule proposes measures to reduce the risk of contamination from biological soil amendments of animal origin: types of treatment, methods of application, and time intervals between the application of a biological soil amendment of animal origin and crop harvest. Allows treated and untreated soil amendments.

LGMA METRICS
The Metrics require application methods and application intervals which meet or exceed FSMA requirements and that treatments are scientifically validated to ensure compliance with specific microbial standards.

No untreated soil amendments are permitted on leafy greens crops, and the Metrics include specific criteria for composted soil amendments, physically heat treated/processed soil amendments, and non-synthetic soil amendments.

FSMA PRODUCE RULE
The Rule proposes requirements for waiting periods between grazing and harvest, monitoring for significant wild animal intrusion, and not harvesting produce that is visibly contaminated.

LGMA METRICS
The Metrics require three environmental assessments for each leafy greens ranch (prior to planting, one week prior to harvest, and on the day of harvest), prescribes buffer zones and allows no harvest of visibly contaminated product. The Metrics require companies to develop and implement SOP’s related to any signs of animal intrusion. These environmental assessments also address flooding, human encroachment, and any other food safety risks.

ANIMAL INTRUSION
FSMA PRODUCE RULE
The Rule proposes requirements which address design, construction, location, storage, maintenance and cleaning and sanitizing of equipment and tools.

LGMA METRICS
The Metrics require specific SOP’s for harvest equipment, container storage and sanitary operation of equipment and facilities, etc. Some of the Produce Rule requirements related to buildings are not applicable to leafy greens production and harvest, and are not covered in the Metrics.

HEALTH & HYGIENE
FSMA PRODUCE RULE
The Rule requires workers to use hygienic practices, including hand washing and maintaining adequate personal cleanliness.

LGMA METRICS
The Metrics require multiple SOPs covering worker health and hygiene. Auditors also verify that workers are trained in, understand, and follow the individual company’s requirements under the Metrics.

EQUIPMENT, TOOLS, & SANITATION
FSMA PRODUCE RULE
The Rule includes specific requirements designed to minimize the risk of contamination during harvest and packing of covered produce.

LGMA METRICS
The Metrics include specific standards corresponding to the Produce Rule’s requirements for growing, harvesting, packing and holding activities. The exception is that the Metrics do not address clostridium botulinum, which is not known to be a risk in leafy greens.