

KATIE HOBBS MEGAN CHEDWICK

Governor Chairwoman

# **Arizona Leafy Greens Food Safety Committee**

1110 W Washington St STE 450, Phoenix, Arizona 85007-(602) 542-0945 FAX (602) 542-0898

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**Re: Arizona Leafy Greens Technical Subcommittee public comments on Harvesting Equipment Issue 8 changes**

The Arizona LGMA Technical Subcommittee (TSC) met on June 27th, 2024, to review the proposed changes to Issue 8: Harvesting Equipment, Tools, Containers, Packaging Materials and Buildings (Field Sanitation) section. The TSC appreciates the subject matter experts, industry food safety professionals and the countless hours of time that went into the development of these proposed changes. We also appreciate that the metrics are a living document that must be reviewed and modified as available science and industry best practices evolve. The TSC has reviewed the proposed changes to this document and offer the following suggestions:

* *To be consistent with previous training language, added “minimum” requirements into lines 51 & 62.*
* *Buildings should remain in the title of Issue 8, and subsection 8.3 to continue to align with PSR language and glossary terms.*
* *The TSC believes that a Hygienic Design Program should be developed for individual programs. We’ve added a requirement for an SOP here, including an equipment schedule for the review, and determining how different types of machines will be evaluated. The parameters for conducting the review will need to be outlined in the SOP, along with the corrective action procedures and verification.*
* *We encourage the development of a cleaning & sanitation appendix, to provide a thorough resource for hygienic design principles. This will allow companies to determine their own hygienic design assessments for their diverse equipment fleets.*
* *We are not in agreement with removing the requirement in the SOP language on line 155: cleaning and sanitation of harvesting equipment when moving between commodities and fields.*
* *The TSC believes combining the requirement for a sanitizing solution when tools are not in use as well as when crew members are on breaks allows for the removal of lines 181-182.*
* *The TSC agrees with adding “post-harvest plant debris” on line 212.*
* *The TSC is not in favor of adding line 232 in, as this was not part of the scope of this review, and not part of the recommendations of the subgroup.*
* *In the verification requirements section, the TSC does not believe the intent is to have each piece of equipment in a harvester’s fleet go through a quantitative verification process but rather the intent is for the harvester to verify the company SSOPs by performing a quantitative verification on a piece of equipment seasonally*.
* *To be consistent with the document our recommendation is to use the term “issue” when referring to the section 8.1 under verification requirements*.

To improve clarity of documentation requirements and what will be expected during an audit, Table 6 documentation requirements have been moved into column 1 with the 7 steps. Column 2 includes process considerations for best practices to utilize during each step in the cleaning and sanitizing process.

The AZ TSC would like the industry to consider applying cleaning & sanitation best practices during transitional periods prior to moving equipment to other growing areas. We do not feel this is clear in the metrics and would like to add language to ensure best practices are followed.

We appreciate the opportunity to review the metrics during this public comment period and the entire review process that Western Growers facilitates. We look forward to continuing to review these proposed changes in our technical subcommittee prior to adoption.

Thank you,

Arizona LGMA Technical Subcommittee