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 Governor Chairwoman

# **Arizona Leafy Greens Food Safety Committee**

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**Re: Arizona Leafy Greens Technical Subcommittee public comments on Water Metrics Ag Water Rule Updates**

The Arizona LGMA Technical Subcommittee (TSC) met on June 27th, 2024, to review the proposed changes to Issue 6: Water section. We applaud the WGA water subgroup for incorporating the newly released FDA FSMA Produce Safety Rule, Subpart E for LGMA metrics compliance. We examined the portion of the document under review and have the following comments to suggest.

* *Line 21: We would like to add back the reference for Appendix A. Appendix A provides valuable information to the industry on conducting Agricultural water assessments which is a direct resource for this water section. We believe this was removed unintentionally.*
* *Line 25-32: For description of the agricultural water source and the type of distribution system; the TSC would like to ensure the intent is not to mean that when a field is cultivated with rows, the changes in furrow water direction would need to be listed in the assessment.*
* *Line 28-29: Tracked changes in the proposed document are not included here but the CALGMA or AZLGMA versions do not have these non-permanent features included. The TSC would like clarification that fertilizer tanks, water treatment systems and changes in gas powered pumps would not need to be re-evaluated each time of a change at a given block. This type of equipment is frequently delivered, moved, and removed from growing blocks throughout the duration of the crop.*

We are aware of ongoing efforts to update the entire water section with subject matter experts with the water subgroup. We encourage during that revision that the water section become clearer on what best practices metrics apply to the different types of water. The LGMA ag water definition includes all water that is intended to or is likely to contact leafy greens, food-contact surfaces and includes water for growing activities (irrigation water or crop sprays) and in harvesting, packing and holding activities. In the best practices portion of the water section, the text is not clear as to what requirements apply to how the water is used, i.e. irrigation use and crop sprays. We encourage the group to be more descriptive and clearer with requirements for different uses to ensure compliance and auditing clarity.

The TSC values the openness and transparent review process facilitated by Western Growers. We appreciate the ability to examine these metrics thoroughly and offer recommendations before finalizing any changes. We look forward to moving through this process and adopting necessary changes that advance food safety practices for the industry.

Thank you,

Arizona LGMA Technical Subcommittee