ABOUT THE LGMA

FOOD SAFETY PROGRAM
The California LGMA brings farmers together to make lettuce and leafy greens safer. The LGMA verifies food safety practices, enforces through government audits, and requires a commitment to continuous improvement.

LGMA MEMBERS
LGMA members are shippers of lettuce and leafy greens in California. They produce over 70% of the lettuce and leafy greens in the United States. In 2019 the California Department of Food and Agriculture reported that lettuce was California’s #8 commodity, valued at $1.8 billion.
NEW STANDARDS FOR WATER

The California LGMA Board voted on April 19, 2019 to strengthen mandatory food safety standards required on farms. The updates include specific directives such as no longer allowing the use of untreated surface water for overhead irrigation of leafy greens prior to harvest.

The LGMA program has always required growers to test their water because it can be a carrier of pathogens. But the new requirements include additional safeguards that ensure farmers: categorize the source of the water; consider how and when water is applied to the crop; conduct testing to assure the water is safe for the intended use; sanitize water if necessary; and verify that all of the above precautions have been taken.

The standards approved by the LGMA Board were in direct response to investigations conducted by the U.S. Food and Drug Administration into 2018’s e. Coli outbreaks involving romaine lettuce. Clues pointed to irrigation water from sources such as canals and reservoirs as a possible cause of both outbreaks.

REVIEW OF FOOD SAFETY STANDARDS

In January of 2020 the LGMA began a systematic review of the food safety standards looking specifically at five areas: water, harvest best practices, soil amendments and crop inputs and adjacent lands. The goal is to complete the review and work with Western Growers to implement updates in these areas over the next several years with an estimated completion date of 2022.
AUDIT CITATION OVERVIEW

LGMA members are audited four times a year on average, including one unannounced audit. Each audit is reviewed by the LGMA Compliance Officer, the California Department of Food and Agriculture and the United States Department of Agriculture. The LGMA Compliance officer assigns each citation one of the levels:

- **Minor Infraction**
  - These violations do not necessarily increase the risk of unsafe product.
  - Corrective action can be taken before the audit is finished.
  - Multiple citations at this level may be elevated to a Minor Deviation.

- **Minor Deviation**
  - These violations do not necessarily result in unsafe product.
  - Corrective action must be provided within 5 days and is verified during the next scheduled audit.
  - Multiple citations at this level may be raised to a Major Deviation.

- **Major Deviation**
  - These violations do not necessarily result in unsafe product.
  - Corrective action must be provided within 5 days and will be verified on-site within 3 days.
  - This level of citation may be elevated to a Flagrant Violation if not corrected.

- **Flagrant Violation**
  - These violations significantly increase the risk of delivering unsafe product into commerce.
  - Penalties can range from temporary to permanent decertification.
  - If this could result in unsafe product going to market the California Department of Public Health is notified.

The following table details the number of non-conformities cited by the LGMA during the 2019/20 season.

<table>
<thead>
<tr>
<th>Minor Infractions</th>
<th>Minor Deviations</th>
<th>Major Deviations</th>
<th>Flagrant Violations</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>78</td>
<td>345</td>
<td>9</td>
<td>0</td>
<td>432</td>
</tr>
</tbody>
</table>

**100% OF AUDIT CITATIONS WERE CORRECTED**
AUDIT CITATIONS DETAILED

CITATION TYPES

In 2019/20, 98% of citations were either Minor Deviations or Minor Infractions – the two least serious categories. Seven citations were Major Deviations, which are serious food safety issues but do not necessarily make food unsafe. No flagrant violations were cited.

DETAILS ON MAJOR DEVIATIONS

For the audit year from April 1, 2019 to March 31, 2020 there were 7 instances when California LGMA members were issued citations considered Major Deviations. In each instance, the Major Deviations were given to different member companies and no member had more than one Major Deviation during the audit year.

Categories for the Major Deviations included:

- Difficulty scheduling unannounced audits (2 instances)
- Employee Hygiene
- Field Sanitation Unit Maintenance (2 instances)
- Unavailable Pre-Season Assessment
- Water source well leak

All the issues were reviewed by the USDA and by the LGMA Compliance Officer. In order for the member to maintain California LGMA certification, completion of corrective actions was required. In addition to the submission of corrective action, these members were re-audited for confirmation that the corrective actions had been implemented.
AUDIT CITATIONS DETAILED

HARVEST ACTIVITIES BREAKDOWN

Field Sanitation 44%
Field Observations 39%
Worker Practices 15%
Transportation 2%

61
General Requirements & Records

62
Personnel, Qualifications & Training

23
Environmental Assessments

40
Water Use

13
Soil Amendments

233
Harvest Activities

Citations
BOARD & STAFF

ADVISORY BOARD MEMBERS & ALTERNATES

Tony Alameda, Sabor Farms
Mitch Ardantz, Bonipak Produce
Ashley Avilla, Dole Food Company
Jan Berk, San Miguel Produce
Todd Brendlin, Grimmway Farms/ Cal Organics
Megan Chedwick, Church Brothers Produce
Steve Church, Church Brothers Produce
Homero Contreras, Beachside Produce
Larry Cox, Coastline Family Farms
John D'Arrigo, D'Arrigo Brothers of California
Pete Donlon, Misionero
Chris Drew, Ocean Mist Farms
Paul Faurot, Faurot Ranch
Armando Figueroa, Braga Fresh Family Farms
Nob Furukawa, Gold Coast Packing
John Jackson, Beachside Produce
Sharan Lanini, Pacific International Marketing
Drew McDonald, Taylor farms
Gurmail Mudahar, Tanimura & Antle
Kristina Nunes, The Nunes Company
Chato Valdes, Sabor Farms
Ron Ratto, Ratto Brothers, Inc
Dan Sutton, Pismo Oceano Vegetable Exchange
Robert Verloop, Coastline Family Farms

STAFF

Scott Horsfall, CEO
Greg Komar, Technical Director (incoming)
Amarachi Okemiri, Member Services and LGMA Tech Director
Mike Villaneva, Technical Director (outgoing)
April Ward, Communications Director