



LGMA

CALIFORNIA LEAFY GREEN PRODUCTS

HANDLER MARKETING AGREEMENT

LGMA Metrics/Proposed FSMA Rules Comparison

Training



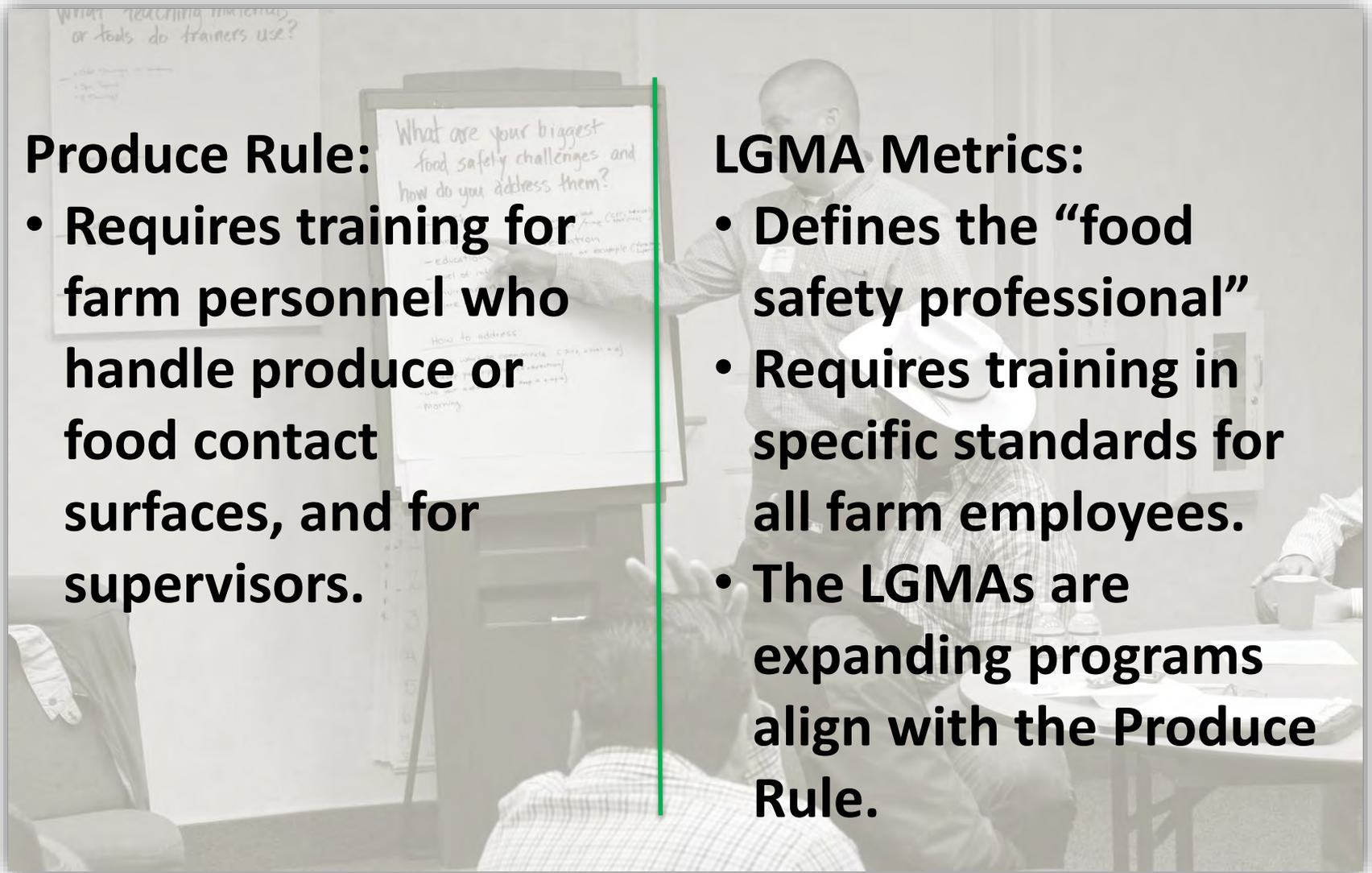
Training

Produce Rule:

- Requires training for farm personnel who handle produce or food contact surfaces, and for supervisors.

LGMA Metrics:

- Defines the “food safety professional”
- Requires training in specific standards for all farm employees.
- The LGMAs are expanding programs align with the Produce Rule.



Water



Water

Produce Rule:

- Ag water (foliar) must be safe and of adequate sanitary quality for its intended use
- Requires creation of water quality profile for all sources
- Verified through testing

LGMA Metrics:

- Requires monthly testing and provides standards for water used directly on crops
- Also includes standards for all other water used in the production of leafy greens

Soil Amendments



Soil Amendments

Produce Rule:

- **Proposes types of treatment, methods of application, and time intervals between the application**
- **Allows treated and untreated soil amendments.**

LGMA Metrics:

- **No untreated soil amendments**
- **Criteria for composted soil amendments, physically heat treated/processed soil amendments, and non-synthetic soil amendments.**

Animals/Environment



Animals/ Environment

Produce Rule:

- Proposes requirements for waiting periods between grazing and harvest, monitoring for significant wild animal intrusion, and not harvesting produce that is visibly contaminated.

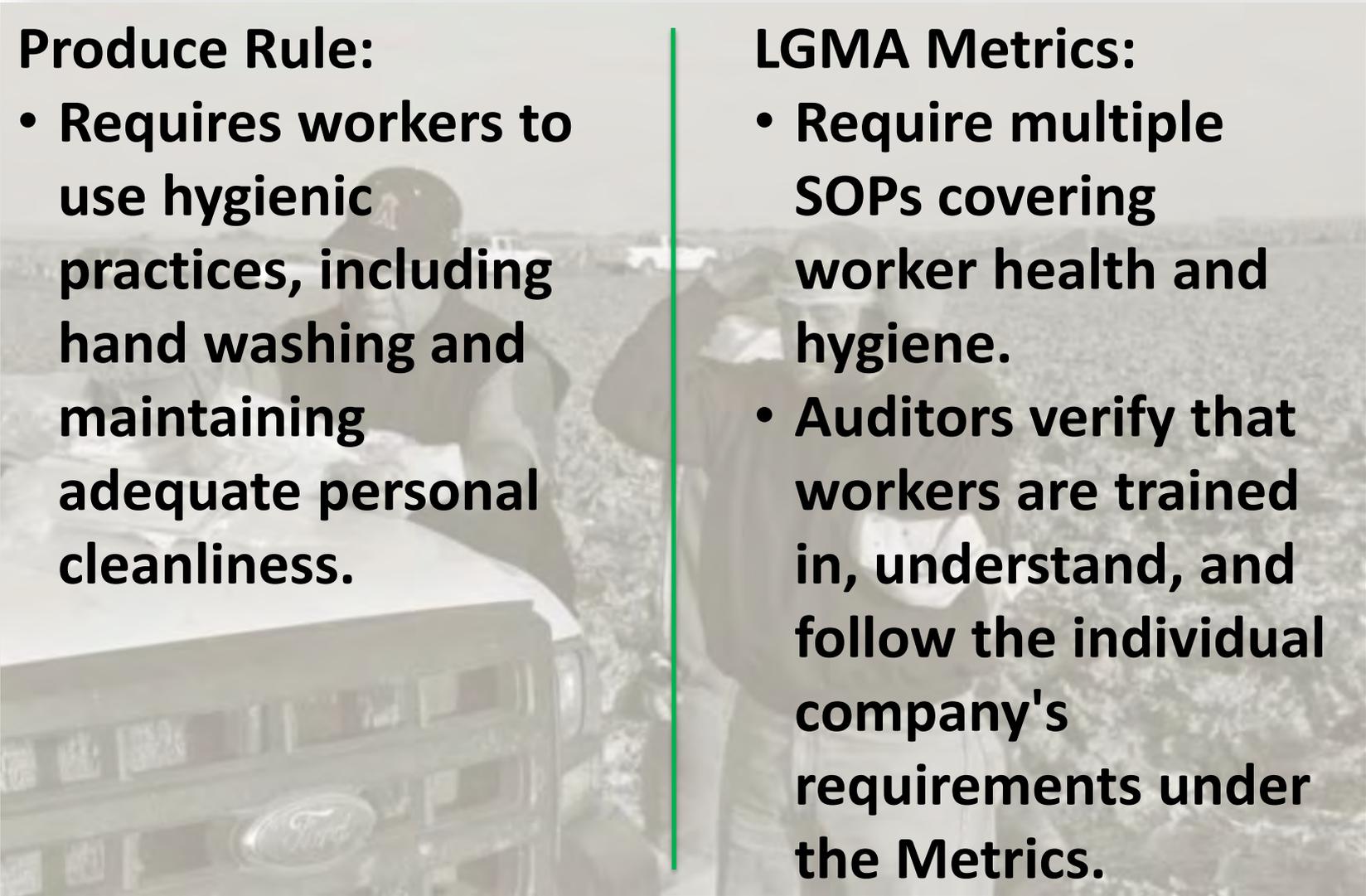
LGMA Metrics:

- Requires three environmental assessments
- Buffer zones and no harvest of visibly contaminated product
- Also addresses flooding, human encroachment, etc.

Health and Hygiene



Health and Hygiene



Produce Rule:

- Requires workers to use hygienic practices, including hand washing and maintaining adequate personal cleanliness.

LGMA Metrics:

- Require multiple SOPs covering worker health and hygiene.
- Auditors verify that workers are trained in, understand, and follow the individual company's requirements under the Metrics.

Growing, Harvesting, Packing, Holding



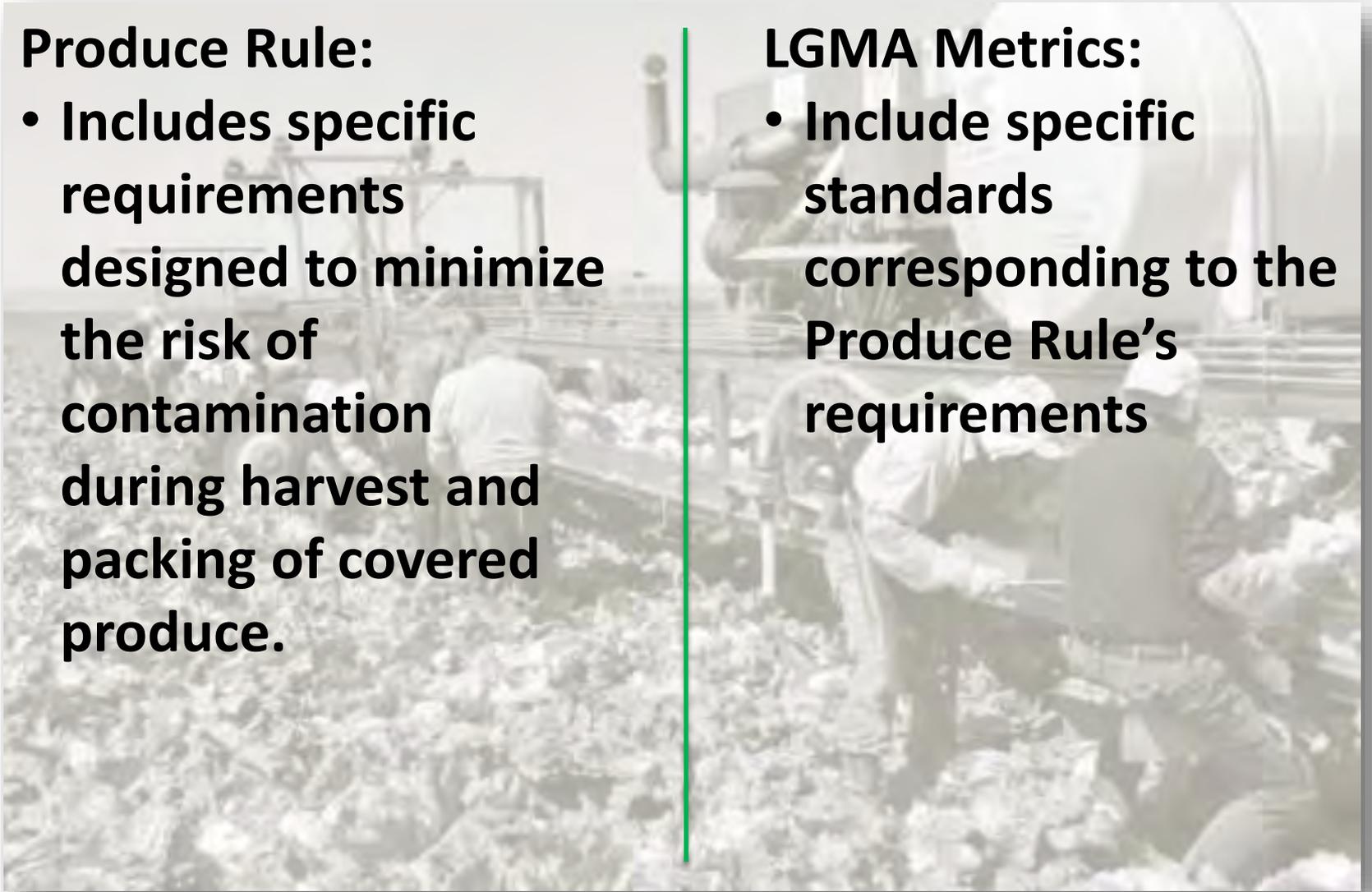
Growing, Harvesting, Packing, Holding

Produce Rule:

- Includes specific requirements designed to minimize the risk of contamination during harvest and packing of covered produce.

LGMA Metrics:

- Include specific standards corresponding to the Produce Rule's requirements



Equipment, Tools, Buildings, Sanitation



Equipment, Tools, Buildings, Sanitation

Produce Rule:

- Proposes requirements which address design, construction, location, storage, maintenance and cleaning and sanitizing of equipment and tools

LGMA Metrics:

- Requires SOP's for equipment, storage and sanitary operation of equipment and facilities, etc.
- Some requirements related to buildings are N/A to leafy greens production; not in the Metrics.

Summary

- **In general, LGMA Metrics meet or exceed standards currently proposed under FSMA**
- **Some concepts, like Water Quality Profile and Statistical Threshold Value, are unique to Produce Rule**
- **Final Rule (Oct 2015) will allow further analysis and comparison**

