



Comparison of current LGMA Food Safety Standards and FDA's Proposed Water Rule

Water System Assessments	LGMA	FDA	
Agriculture water system risk assessments	✓	✓	The ag water assessments are similar but the LGMA also requires the creation of a detailed system description that notes what areas the water system services. For example which farm lots will receive water from the system. And also requires a description of how the water will be used which takes in to consideration all ag water uses, not just irrigation.
Characterize water system	✓	✓	The LGMA has two (2) types of water Type A and Type B. Where Type A is unlikely to have indicators of fecal contamination. The FDA does not have formal water system designations.
Mitigations			The LGMA requires all mitigation to be in place before the use of water while the FDA suggests mitigations be performed promptly but at least be in place by the end of the season.
Buffers between adjacent land hazards and water sources and systems	✓		The LGMA has required buffers from adjacent land hazards and water sources and systems that can be found in Table 0. Distances range from 30 feet to 300 feet depending on the hazard, surrounding topography, and climactic conditions.
Water Testing	✓		The LGMA requires that all water used be characterized (be of a known microbiological quality) before use with indicator testing.
Has Acceptability Criteria for <i>generic E.coli</i>	✓		Depending on the system type, and water use, the LGMA has different requirements for indicator levels. For Type B water we require a geometric mean of 126 MPN For Type A water we require most samples to be non-detect. (2 of 3 non-detect, one not greater than 10 MPN)
Verification			
Requires indicator water testing for purposes of on-going verification	✓		Depending on the system type, and water use, the LGMA has different frequencies of water verification testing from a few times per year to monthly. The LGMA also has different volumes of testing where some testing events require only one (1) 100 mL sample and others require three (3) 100 mL samples per test. For water treatment the LGMA requires Total Coliform testing to verify treatment is effective.
Water Treatment			
Requires water treatment for Type B water that will contact the edible portion of the crop within 21 days of scheduled harvest	✓		The LGMA requires water treatment while the FDA only has it as a recommendation.
Requires validation of water treatment systems	✓		All treatment systems must be set up and have a documented procedure for the use of the system. Additionally, the system must be validated to be effective before 21 days to scheduled harvest.
Requires monitoring of water treatment systems when used	✓		Every time a treatment system is used it must be monitored to assure it is functioning properly.
Corrective Actions			
Find and Fix (correct) the water system when concerns are found	✓	✓	The LGMA requires that all water systems issues be reviewed and the issues corrected.
Requiring water not be used if found out of compliance	✓	✓	Agricultural waters are not to be used until the water is found to be in compliance with acceptance criteria.
Requiring pre-harvest product pathogen testing if water is found out of compliance and was applied to the edible portion of the crop	✓		The LGMA requires that product be tested for pathogens before harvest when water not meeting acceptance criteria has contacted the edible portion of the crop. If found positive the product can not be harvested for the fresh market.
Root Cause Analysis (RCA) for certain water system non-conformances	✓		Performing Root Cause Analysis is required in some areas of the the LGMA to prevent re-occurrence of non-conformances.