Instructions

- All participants are muted.
- There will be time for questions and answers throughout the meeting.
  - We may not get around to all comments/questions, BUT you may leave additional comments in the comment box to be compiled after the session.
- This session will be recorded and notes will be shared via the listserv and on our website after the call.
Agenda

- **Water Summit Summary**
  - Very high level, preliminary summary of the meeting will be discussed on this call
  - A more detailed summary paper will be drafted

- **Review of PSA Resources Related to Ag Water**
Water Summit
Summary

February 27-28, 2018
Covington, KY
Water Summit Stats

• 102 people in Covington, KY
• 24 Water Summit Remote Sites
  • 243 attendees at remote sites
• Online attendees from U.S., Puerto Rico, and 7 countries
  • Day 1 Attendance Online: 202
    • 143 came back for some or all of Day 2.
    59 (29%) did not come back for Day 2.
  • Day 1 Attendance Online: 188
    • 45 (24%) of those were new registrant email addresses, who did not attend on Day 1
Water Summit Remote Sites

Water Summit Meeting
Covington, KY
Water Summit Remote Sites

- Portland, OR
- Davis, CA
- Mt. Vernon, WA
- Yakima, WA
- Yuma, AZ
- Maricopa, AZ
- Geneva, NY
- Orono, ME
- Barre, VT
- College Park, MD
- Hazel Green, AL
- Balm, FL
- Tifton, GA
- Baton Rouge, LA
- Raleigh, NC
- Greenville, SC
- College Station, TX
- Uvalde, TX
- Weslaco, TX
- Mayagüez, PR
## Regional Center Remote Participation

<table>
<thead>
<tr>
<th>Regional Center</th>
<th>Total Number of Sites</th>
<th>Total Participants</th>
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<tbody>
<tr>
<td>North Central</td>
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<td>23</td>
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<tr>
<td>Northeast</td>
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<tr>
<td>Western</td>
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<td>Southern</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>24</strong></td>
<td><strong>243</strong></td>
</tr>
</tbody>
</table>
Water Summit Remote Sites
Water Summit Remote Sites
Meeting Documentation

• Agenda and speaker presentations are available online at: https://producesafetyalliance.cornell.edu/water-summit

• Recording of the entire meeting, in chapters on YouTube

• Comment opportunity for those who did not attend online or in Covington
  – Available on our website:
  – Must review full meeting recording before submitting comments on 3 breakout areas
  – Only available to those who did not attend in Covington or at a remote site
  – Comments due by April 20, 2018
Objectives

• Discuss the diverse ways water is being used on farms across the country, and challenges/concerns related to current standards for water quality and testing.

• Discuss and develop minimum standards, practices, or approaches to identified challenges and concerns based on existing PSR requirements that control hazards.

• Recommend actionable next steps related to the standards, practices or approaches that address the identified challenges and concerns
Achieving Goals and Objectives

1. Small series of focused presentations to provide foundational information in key areas
2. Breakout sessions to discuss information and develop responses, solutions, or more questions
3. Share information from across all the breakout groups to see where consensus or dissent lies
4. Develop plan for next steps to move forward
Three Breakout Session Topics

1. Identify concerns and challenges to meeting current PSR production water standards (Day 1)
2. Identify specific hazards to produce safety related to water use (Day 1)
3. Processes or management options (Day 2)
Group Session Discussion

Practical approaches and practices to control risks on the farm that are workable for growers and meet FDA public health goals

• Concern about the quantitative standard
• Issues include:
  – Acknowledged the standard is science based, but concerns that the science is not specific to agricultural water use
  – MWQP is based on past (years old) data
  – Concerns about allowance of die-off
    • Lack of confidence that die-off “an adequate level of public health protection”
• Solutions:
  – Build a new standard
  – Utilize alternatives; Concerns about alternatives
    • Too much pressure on growers to know good science when they see it
    • If everyone uses an alternative, why is there a standard
  – Fix it in Guidance; How much can be fixed in Guidance?

Produce Safety Alliance
Group Session Discussion

• Significant concerns expressed about current Subpart E
  – FDA wanted to know what was workable within context of current rule
  – Several groups discussed opening the rule as a need in report out #3
• Took poll regarding current Subpart E standards
  – 30 voted to get rid of the rule in its current state
  – 14 voted to keep it
  – The rest of abstained
    • Did not include people joining remotely, though input for all options
Reasons the Rule Needs to Change
(30 Votes)

• Concerns about relevance of science that supports it
  – Quantitative standard
  – Die-off allowance
  – Many questions about public health protection and criteria

• Method of calculating the MWQP
  – Namely over four years, where the previous years impact the number

• Does not incorporate historical water testing data

• FDA is not required to re-evaluate the rule based on new science
Reasons the Rule Needs to Change, Cont. (30 Votes)

• Shift standard to incorporate qualitative aspects such as risk assessment/sanitary survey
  – The current quantitative criteria are too strict/rigid

• Are current testing methods adequate regarding confidence intervals in the rule criteria?

• Are the current standards protective of the farmer?
  – If a grower is implicated in an outbreak and they have followed the Rule as is or used the die-off provision, will they be protected?
Reason Why Rule Should Stay the Same (14 Votes)

• The Rule should not be changed without having a known, better option (*Fear of the unknown*)
• Industry is already meeting the standard
• Grower confusion surrounding any new requirements/standards (*Moving the goal post for growers to meet*)
• Growers like having a numerical standard to meet
• Regional concern about water quality
• Regional concern about enforcement of the standards
  – Enforcing what is in the Rule versus interim guidance

*Many who voted to keep the Rule acknowledged agreement with the list of concerns expressed by those who did not want to keep it, but for reasons listed above, voted to keep it.*
Participants Who Abstained

• Would like to keep a numerical standard, not the MWQP
  – Do not agree with the sampling/testing requirements to meet the standards; includes frequency of testing

• Should be able to use historical data
  – Do not exclude based on the timing of testing, as it is currently stated in the Rule

• Buyers are likely to incorporate Rule requirements into their standards.
  – These buyer standards will continue to become more stringent.
  – Buyers will incorporate FDA guidance into their standards, regardless of if it is in the Rule.
  – This was ‘starred’ as a significant point of discussion.
Participants Who Abstained, Cont.

- What are the consequences of non-compliance for growers?
  - More information is needed in order to decide if the rule should stay
- Significant concern about water source definitions and 6 hour hold time requirements for test methods
- The Rule currently contains no specific triggers
  - What do the qualitative requirements mean to a grower if there are no buyer standards? How do you know you are really meeting them or failing them?
Overall Thoughts

• Regardless of how people voted, there were some universal concerns that highlight real issues with the Rule
• Everyone recognizes the need for food safety, but growers want to implement practices that are relevant
• Lots of comments about the need for specific assistance, guidance, educational materials, and common word usage
• Significant desire for FDA to be more transparent about the research they are using/generating and progress/thinking on all things water related
Next Steps

• Finish collecting and tallying break out session data
  – Likely to take several months – over 60 pages of notes to dig through!

• Draft and circulate summary paper

• Clarify actionable next steps related to the standards, practices, or approaches that address the identified challenges and concerns
  – Follow up periodically with FDA so they can share progress/thinking on the action items
A HUGE Thank You!

• Regional Center Collaborators & Hosts of Remote Sites
• Speakers: Dr. John Griffith, Dr. Channah Rock, Dr. Kevin Oshima, Mr. Jeff Soller, Dr. Samir Assar, Ms. Kruti Ravaliya, and Ms. Chelsea Davidson
• Covington Facilitators: Channah Rock, Chip Simmons, Achyut Adhikari, Trevor Suslow, Stuart Reitz, and the PSA Team
• Regional Center Points of Contact in Covington: Elizabeth Newbold, Phil Tocco, Michelle Danyluk, Connie Fisk
• Production Partners Media
• Radisson Staff in Covington, KY
• PSA team
Key Sponsors and Collaborators

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AFDO
Connect Share Impact Protect

WRC
Western Regional Center to Enhance Food Safety

CompWALK.farm

SC
Southern Center for Training, Education, Extension, Outreach, and Technical Assistance to Enhance Produce Safety

FDA
U.S. Food & Drug Administration

North Central Region Center for FSMA Training, Extension and Technical Assistance
Water Summit
Questions & Discussion
PSA Updates
Agricultural Water Clarification & Resources

• The Water Summit has highlighted the need to ensure trainers are covering Subpart E and extended compliance dates correctly

• Previous Produce Educator’s Call on August 29, 2017 covered this topic and provided suggestions for how to cover this material in the interim

• **Reminder:** All PSA modules (including 5.1/5.2) must be delivered in order for participants to be eligible for the AFDO certificate of course completion
PSA Resources & Materials

• PSA Grower Training & Train-the-Trainer Curriculum (Spanish & English)

• Supplemental fact sheets and teaching add-ons
  – Updates on agricultural water (PPT)
  – ‘Is this agricultural water?’ (PPT)
  – Cleaning & Sanitation Activity (Photos)
  – Post-harvest Sanitizer Tool (Excel)
  – Required PSR records (Word template)
  – Exemptions & Exclusions (PPT)
  – And much more!
Recent FDA Announcements – Agricultural Water
### FDA Proposed Rule: Water Compliance Dates

<table>
<thead>
<tr>
<th>Business Size</th>
<th>Compliance Dates For Most Produce</th>
<th>Proposed Water Related Compliance Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>All other businesses (&gt;$500K)</td>
<td>1/26/18</td>
<td>1/26/22</td>
</tr>
<tr>
<td>Small businesses (&gt;$250K-500K)</td>
<td>1/28/19</td>
<td>1/26/23</td>
</tr>
<tr>
<td>Very small businesses (&gt;$25K-250K)</td>
<td>1/27/20</td>
<td>1/26/24</td>
</tr>
</tbody>
</table>

- According to the Proposed Rule issued Sept. 2017, compliance dates for all agricultural water requirements allow for an additional four years.
- For example, ‘all other businesses’ would have until 2022 to begin taking their water samples.
FDA Water Compliance Date Extension

In September 2017, FDA published a Proposed Rule called Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption; Extension of Compliance Dates for Subpart E.

- If implemented, extends ALL provisions of Subpart E (Agricultural water) including the safe and sanitary quality requirement, the annual inspection requirement, and the postharvest water monitoring requirements
- The reason given for this extension is “to address questions about the practical implementation of compliance with certain provisions and to consider how we might further reduce the regulatory burden or increase flexibility while continuing to achieve our regulatory objectives, in keeping with the Administration's policies.”
- Until more is known, the following water requirements outlined in this module are the Rule.

SUPPLEMENTAL MATERIAL
FDA Water Compliance Date Extension: What Growers Should Do in the Meantime

• Continue water testing
  – To better understand water quality
  – To meet buyer and audit requirements

• Develop water management strategies to identify and reduce risks such as conducting surveys of water sources

• If growers have never tested their water, they should start testing or at least consider the benefits
  – Test for quantified generic *E. coli*
  – Test before using the water
  – Test during frequent use periods

SUPPLEMENTAL MATERIAL
FDA Fact Sheet: Equivalent Water Testing Methodologies

Equivalent methods to EPA Method 1603 (membrane filtration with modified mTEC), include:

• Membrane filtration methods (colony forming units, or CFU)
  – mTEC agar (EPA 2010, APHA 2012, ASTM 2000)
  – mColiBlue ampules (Hach method 10029)
  – mEndo followed by NA-MUG agar (APHA 1997)
  – MI agar (EPA 2012)

• Most Probable Number (MPN) methods
  – Colilert (using Quantitray 2000 tray)
  – Colilert 18 (using Quantitray 2000 tray)
Next Meeting

- **Tentative:** May 21, 2018
- **Tentative topic:** Navigating Exemptions & Exclusions
- Meeting info to be sent out via the listserv closer to the time of the call
- Submit other topics for discussion to Gretchen (glw53@cornell.edu)
The PSA Website
http://producesafetyalliance.cornell.edu/

- Like us on Facebook!
- Or Follow us on Twitter! @Produce_Safety

Join the listserv

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