

Key Takeaways

“Does This Look Risky to You? Diving into Subpart E”

November 10, 2022 | Produce Safety Webinar Series Summaries (#10)

Alexis M. Hamilton, Laura K. Strawn, Michelle D. Danyluk, and Channah M. Rock

Top 5

- 1) Under the proposed FSMA PSR subpart E language, a farm makes a determination about the sanitary quality of their preharvest agricultural water based on an AgWA.
- 2) A farm may be exempt from conducting an AgWA if they are using (i) tested ground water showing no detectable generic *E. coli*, (ii) a public water supply with supporting documentation, or (iii) treated agricultural water. If a farm decides to treat agricultural water in order to meet the proposed rule, a measure of agricultural water quality may still be needed in order to treat the agricultural water effectively.
- 3) Industry members can focus efforts on conducting hazard assessments that can potentially impact their water sources seasonally, daily, as well as with multiple individuals to better capture the potential variability and likelihood of hazards to their water sources.
- 4) Industry can try ranking production water hazards and associated risks to help support decision making on how to best use farm resources to reduce risks of water sources to produce.
- 5) Despite the fact that many risk assessments have been done for various pathogens and produce types, none have been used to establish a regulatory limit for a pathogen in produce.
- 6) Acceptable risk levels (or standards) may be defined by numerical standards or quantitative values, such as the number of infections per a set number of individuals in a given period of time; however, for these standards to be meaningful and enforceable, both scientifically and legally, they must have a certain level of confidence.
- 7) Equal minimum levels of public health protection are possible, and there are many ways for and tools to help farms get there. Documentation will be critical to justify AgWAs and decisions, given that the subjectivity of AgWAs will be challenging to regulate.

Acronym Key:

E. coli: *Escherichia coli*

AgWA: agricultural water assessment

FSMA: Food Safety Modernization Act

PSR: Produce Safety Rule

Additional Reading

- Dery J, Brassill N, Rock CM (2019.) Minimizing Risks: Use of Surface Water in Pre-Harvest Agricultural Irrigation. In: Coop. Ext. Univ. Ariz. <https://extension.arizona.edu/pubs/minimizing-risks-use-surface-water-pre-harvest-agricultural-irrigation>
- Dery J, Choppakatla V, Sughroue J, Rock CM (2021a). Minimizing Risks: Use of Surface Water in Pre-Harvest Agricultural Irrigation; Part III: Peroxyacetic Acid (PAA) Treatment Methods. In: Coop. Ext. Univ. Ariz. <https://extension.arizona.edu/pubs/minimizing-risks-use-surface-water-pre-harvest-agricultural-irrigation-part-iii-peroxyacetic>
- Dery J, Gerrity D, Rock CM (2021b). Minimizing Risks: Use of Surface Water in Pre-Harvest Agricultural Irrigation Part II: Sodium and Calcium Hypochlorite (Chlorine) Treatment Methods. In: Coop. Ext. Univ. Ariz. <https://extension.arizona.edu/pubs/minimizing-risks-use-surface-water-pre-harvest-agricultural-irrigation-part-ii-sodium-calcium>
- U.S. Food and Drug Administration (2022). Agricultural Water Assessment Builder. In: FDA. <https://www.fda.gov/food/food-safety-modernization-act-fsma/agricultural-water-assessment-builder>

If you have difficulty acquiring access to any of the references listed within this document, please contact the grant coordinator, Christina Kessler, at christinakessler@ufl.edu.