FRUIT CONTACT WATER UNDER FSMA’S PROPOSED PRODUCE SAFETY RULE – WHAT’S NEW FOR FLORIDA CITRUS?

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Proposed Produce Safety Rule

Agricultural Water:
Inspect entire water system “under your control” (source, distribution system, facilities and equipment).

Water that...
- Directly contacts product during/after harvest
- Used to make “agricultural tea”
- Used to clean food contact surfaces
- Used to wash hands
- ...no generic E. coli in 100 ml water

Proposed Produce Safety Rule

Water that...
- Directly contacts the harvested produce preharvest
  - <235 E. coli in 100 ml (single sample)
  - <126 E. coli in 100 ml (5 sample rolling geometric mean)
  - Geometric Mean of 5 Water Samples = ((N1)(N2)(N3)(N4)(N5))^{1/5}

Proposed Produce Safety Rule

Water that...
- Does not contact the harvested produce preharvest
  - No Standards

Proposed Produce Safety Rule

Agricultural Water Testing Frequency
- Everyone
  - Beginning of growing season and every three months
- Untreated surface water NOT subject to runoff
  - Monthly
- Untreated surface water subject to runoff
  - Every 7 days
- No testing if public source or treated water
  - Must have records (SOP) for treatment

Proposed Produce Safety Rule

Geometric vs. Arithmetic Mean

(just google “free geometric mean calculator”)
Or you can use Excel “=geomean(x,y,z...)”
RECORD KEEPING ASSOCIATED WITH WATER TESTING

Growers will be required to keep records of water testing under the proposed rule including:
- Water source/distribution inspection findings
- Public (municipal) water source/system documentation (if used)
- Water treatment method SOP/treatment monitoring results (if treating water)
- Water testing results
- Scientific data/information to supporting alternative (if used)

COMPLIANCE DATES

FDA has proposed to extend compliance dates associated with water testing beyond the effective dates for the rest of the proposed produce safety rule.
The extended compliance dates depend upon the size of the farm

COMPLIANCE DATES

- **Six years** from the effective date of the final rule for very small farms (<$250,000)
- **Five years** from the effective date of the final rule for small farms (<$500,000)
- **Four years** from the effective date of the final rule for other farms.

UPDATE ON VARIANCE WORK

Variance – Procedures, processes and practices to be followed under the variance are reasonably likely to ensure the produce is not adulterated and provides the same level of public health protection.

This is why we’ve been looking at the die off of *E. coli* once applied to citrus crops.

SUMMARY

- New water standards are coming under FSMA
  - Final micro numbers and testing frequency unknown
  - Only for fruit contact water
  - Implementation dates 2019 at the earliest

- Work is ongoing to generate data for a Variance

QUESTIONS?

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