

Appendix C: Product Testing Strategy

This appendix is supplied as interim guidance for product testing as specified in the *Commodity Specific Food Safety Guidelines for the Lettuce and Leafy Greens Supply Chain*. The strategy outlined below was initially developed by Primus Labs for the *Immediate Technical Action Plan for the Spinach Industry of Monterey, San Benito and Santa Clara Counties*. The only substantial change in the plan as proposed by Primus Labs is the addition of *Salmonella* testing to the protocol (as opposed to only testing for *E. coli* O157:H7).

Protocol

- A composite sample of edible lettuce or leafy green leaves from plants still in the ground will be collected. This sample will be comprised of 9 samplings of at least 100 grams each and then made into a composite sample of at least 900 grams. This 900 gram composite sample will be taken 10 days or less before harvest, and shall be tested for *E. coli* O157:H7 and *Salmonella*. The block will be sampled using a "Z" pattern which is typically used for pesticide residue analysis.
- Aseptic sample collection techniques will be utilized.
- Results shall be available for review before harvest of the field.

Measurement Criteria

- No confirmed positives for *E. coli* O157:H7 or *Salmonella*.

Remedial Actions

- All products from blocks which do not pass the above criteria will be destroyed before harvest.
- All equipment utilized to destroy the crop must be cleaned and sanitized upon exiting the field.
- The field will not be re-planted for edible food crop production for the remainder of the season in which pathogens are detected.
- This action will be documented and available for verification from the grower responsible party.

Timeline

- After irrigation water that exceeds generic *E. coli* water quality standards is used on lettuce or leafy greens, product from the block must test negative for the presence of *E. coli* O157:H7 *Salmonella*.