



From the pages of [Jim Prevor's Perishable Pundit](#)

Very often the produce industry can be its own worst enemy. Because the crop is perishable and few growers are national or global producers, there is a constant desire to differentiate various growing regions. Mostly this just results in marketing of questionable value where some region, typically with inadequate funds, tries to differentiate itself when a smarter course would be a more unified marketing approach.

Every so often, though, these efforts move into food safety and dubious science.

So, as the industry has struggled with the [Romaine Crisis](#), farmers in other areas have struggled to differentiate themselves to consumers. As a marketing program, this makes perfect sense. One of the horrible failures of the CDC and FDA is they use language that simply does not mean anything to consumers.

What is a Yuma? Where is that? What is the growing season there? How can anyone know the lettuce in a salad is not from there?

So, it is an important effort to make sure consumers know that the product available at a store or in a restaurant is not a focus of concern. But it is easy for well-meaning farmers, anxious to differentiate their crop, to go beyond marketing into dubious science.

So, for example, here is one article: [South Jersey Farmers and Distributors Promising Safe Romaine Lettuce Despite Nationwide Concern](#). The title is great, and left at that — saying that there is no indication of a problem with Romaine grown in South Jersey — the message is properly targeted.

But within the article, the general message morphs into a bizarre claim that there can never be a problem:

But the co-owner of Hensel Farms in Milmay, Eric Hensel, is saying that you don't have to worry about E. coli if you're getting your lettuce from New Jersey, partially because of how it's grown.

"A lot of the western lettuce is grown in deserts, and water is basically canaled in through canals, and in those canals, there's the possibility of animals living there and that's all you

really need is something to contaminate the water and it's a possibility it could contaminate the lettuce," said Hensel.

Hensel says that pretty much the entire East Coast is irrigated with well-water, which is tested multiple times a year.

"So, that really eliminates the possibility of E. coli or any such dangerous bacteria getting into the lettuce," said Hensel.

The problem with this statement is that it is not true. Yes, of course, water traveling through open canals to be used as irrigation water is one, of many, critical control points. But it is very far from the only way for a field to be contaminated.

Birds fly over fields everywhere, and they defecate as they do. Animals intrude on fields everywhere —and they defecate. Filth flies reach fields all over the world. Workers and other humans can carry pathogens into a field. Even if well water is safer, animals can fall in wells and, in fact do so every day.

We have zero evidence that the problem in Yuma was a consequence of canal irrigation. We certainly have no reason to say that not being exposed to that particular critical control point is an important food safety advantage.

In addition, these risks exist in nature, but massive efforts are made to mitigate these risks. Almost all the Romaine growing out west is done under the auspices of the [California Leafy Greens Marketing Agreement](#) and its Arizona cousin, the [Arizona Leafy Greens Marketing Agreement](#).

These [standards are best in class](#) and include requirements for water testing, etc. In most of the rest of the country, growers operate under a much lower standard, using [Good Agricultural Practices](#) audits or no audits at all.

Now we understand fully the desperation of farmers whose income has been hurt by this or other food safety outbreaks - even when they were completely uninvolved. But we need to make sure that industry claims are science-based. Otherwise we won't have credibility when the next outbreak hits.

To make sure that the science is clear, we shared this piece with [Trevor Suslow](#) at UC Davis and asked him to provide a science-based assessment of these claims, while understanding the urgent desire of non-Yuma growers to differentiate themselves.

Here is what Dr. Suslow shared with us:

Whether part of national distribution channels or largely regional and local-grown marketing, I fully support all growers' pride and passion for their region, farm, and dedication to providing wholesome and nutritious products for the health and enjoyment of consumer. I also fully understand and am aware of the documented negative economic impacts that outbreaks have to non-implicated farms across a commodity, and potentially all related categories from all regions.

What we must all focus on, however, is the impact to those outbreak victims directly affected by the implicated product contamination. All stakeholders should be working cooperatively and as openly as possible to understand root-causes and needed solutions.

This is why as consumer messaging is developed to support regional and locally grown, it is important to keep in mind the available science-based and other factual information related to the current outbreaks attributed to Romaine lettuce for a key production region of the U.S.

Based on long-standing and current research among several universities and land-grant institutions, as well as over a decade of intensive industry-based testing:

- *Surface water sources used for irrigation and other crop management practices commonly have detectable levels of fecal indicator *E. coli* present. That is a fact.*
- *These same water sources have a highly variable level of pathogens of concern for potential foodborne illness. The prevalence is almost always very low and the estimated numbers of viable (able to grow) cells, when reported, is also very low. That is a fact.*
- *Crops produced using these water sources are overwhelmingly wholesome and not associated with recognized cases of illness. That is a fact.*
- *Detectable contamination of these crops does occur among individual lots and some is not detected and enters commercial markets and triggers recalls or, more seriously, causes illness and outbreaks. That is a fact.*
- *Public information which identifies the contamination source, water or otherwise, and factors contributing to the current outbreaks is not available. That is a fact.*
- *Water sources from well-constructed and maintained wells are predominantly free of detectable levels of fecal indicator *E. coli*. That is a fact.*
- *Well water is typically, but not exclusively, free of detectable levels of pathogens. That is a fact.*
- *Absence of indicator *E. coli* and pathogens in well water does not provide any*

assurance that the crop may not be contaminated with foodborne pathogens from a myriad of other environmental, crop input, and human activities potentially present in all regions and production districts. That is a fact

The last bullet point is the over-arching foundation for all Good Agricultural Practices standards and audits, as well as the curriculum of the [Produce Safety Alliance](#) grower training programs. One message that is strongly emphasized during PSA trainings is that no food safety program and no audit or inspection can guarantee food safety.

A broad awareness and understanding of on-farm risk factors and the associated essential prevention programs across the full supply-chain are needed to support and enhance consumer protection and confidence in the produce supply we all enjoy. Focusing on one aspect, water quality, of this systems-approach to food safety can be both misleading to consumers and, more dangerously, promote an artificial sense of security for growers.

I have a high degree of confidence that the New Jersey farmer, and others seeking to differentiate local supply from this national outbreak, know and embrace this fact; efforts to develop simplistic and clear messaging to consumers to minimize farm income losses from an event beyond one's immediate responsibility and control often masks well-established knowledge and may be unintentionally misleading to buyers and consumers. That is a fact.



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Local has been all the rage the past few years, and it has a powerful story to tell. Buying local may support green space in one's community. On certain products, the product can be harvested later and be more flavorful. Under some circumstances, different varieties can be used that may be preferred if the farmer knows they don't have to ship long distances, and with truck prices going through the roof, there may be economies available.

There are marketing programs such as [Jersey Fresh](#) that resonate with many consumers. So there are lots of ways to differentiate local produce.

But to say that any of this "*...eliminates the possibility of E. coli or any such dangerous bacteria getting into the lettuce*" is not true and saying such a thing is not wise. It is making a promise to consumers that the industry can't keep.

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