## Basis for the proposed standards

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### Key considerations

- Water must be safe and of adequate sanitary quality for its intended use
  - Farms should understand the quality of water they use
  - Water quality informs farms on when and how to safely use their water
  - A fundamental component of assessing the adequacy of water is routine sampling and testing

### Key considerations

- Different potential for contamination exist in different water sources
  - Public water systems
  - Ground water (wells)
  - Surface water
    - Runoff is difficult to recognize & control (river or lake)
    - Runoff can be detected & managed (on-farm pond)

Table 7. Relative Likelihood of Produce Becoming Contaminated with Pathogens of Public Health Concern from Agricultural Water					
	Least 💳		Most		
Source	Public Drinking Water	Ground water	Surface water protected from runoff	Surface water unprotected from runoff	
And where contamination is known to exist, the likelihood of contamination is a function of the following factors:					
Contact with commodity	Indirect contact		Direct contact		
Commodity effects	Unlikely infiltration		Susceptible to infiltration		
	Surface not conducive to adhesion		Surface conducive to adhesion		
Application timing	Early in crop growth	Late in crop growth	During harvest	Postharvest	

### Water used in growing activities

- EPA recreational standard, 235 CFU per 100 ml and 126 CFU per 100 ml geometric mean
  - Epi-based
  - Mechanisms of transmission different
- Most widely used, familiar to industry groups
- Applies to direct application methods (contact with harvestable portion)
- Alternatives acceptable

#### No detectible standard

- Specific uses (sprouts/hand washing/treated agricultural teas)
- Circumstances where environmental die-off processes are not likely to occur
  - direct contact during or after harvest (washing/cooling)
  - ice/food contact surfaces

# Frequency of monitoring

- Overall goal was to provide practical intervals for monitoring
- Water source major consideration
  - Ground water
  - Untreated surface water
    - Potential for runoff: 7 days
    - Protected, controlled: once per 3 months during