



March 2, 2021

Dear Western Growers Board of Directors and Members:

I am writing today in support of Western Growers' Collaborative Data Sharing Project, which looks to leverage insights from preharvest sampling and testing data that many leafy greens growers are already collecting. The ultimate goal is to convert data into information that will help growers and regulators prevent produce contamination and reduce the potential for outbreaks of foodborne illness.

The importance of collaborating to harness and democratize data streams to protect the food supply is a key element of two important documents released by the FDA last year: the [New Era of Smarter Food Safety Blueprint](#) and the [2020 Leafy Greens STEC Action Plan](#).

We recognize that most of your members operate under the premise that food safety should not be a competitive issue, and it's in this spirit that the industry has worked over the years to address the issue of recurring outbreaks of foodborne illness associated with romaine lettuce and other leafy greens. This project speaks to your commitment to continue to work collaboratively, so that the entire sector can further strengthen the safety of leafy greens.

### **Data-Sharing Project**

Many leafy greens growers already conduct preharvest product testing to verify that preventive safety measures have been effectively implemented and to meet buyer requirements. The Western Growers Association data-sharing project looks to use preharvest product and water sampling data trends, in a trusted and secured manner, to allow all of industry to gain insights regarding the relative risks of pathogen contamination. The platform is a digital system that will allow for the collection of sampling information such as sampling patterns, collection timeframes, target organisms, and results.

It is our understanding that the sampling data will be aggregated and anonymized to preclude attribution to a particular grower yet empower industry and public health officials by democratizing insights. In addition to allowing everyone to get smarter and safer together, this approach may also reduce duplicative verification and surveillance sampling.

The information that growers submit will be maintained by Western Growers in a private database. However, in the spirit of private-public data sharing, a report containing aggregate data

will be provided to FDA. We would encourage that aggregate data also be shared with others to allow for a meaningful analysis of the data and trends by all stakeholders.

This is a voluntary program, but high-levels of participation will help industry and public health officials identify trends in contamination of leafy greens, which would then help prioritize research, training and outreach.

### **Using Data to Enhance Preventive-Oriented Food Safety Actions**

We believe that increased sharing and analysis of data could help identify trends that may be contributing to contamination and inform our understanding of when and how contamination occurs, while potentially allowing both government and industry to maximize resources spent on these efforts.

This project is very much in line with the goals set forth in two recently released FDA initiatives. The New Era of Smarter Food Safety Blueprint outlines our plans to create a more digital, traceable and safer food system, speaks to the importance of utilizing new data streams to enhance food safety, strengthen preventive approaches, and support innovative production technologies. In addition, the Leafy Greens STEC 2020 Action Plan stresses the importance of sharing data to avoid a duplication of efforts as we work to address gaps in our knowledge of the factors on farms and in facilities that can lead to contamination.

It can't be overstated how important data is to the safety and security of our food supply. We at FDA hope that the leafy greens community sees the value that this program can bring to the food industry as a whole as we look to implement the New Era of Smarter Food Safety. FDA looks forward to continuing our work with Western Growers to help ensure that leafy greens, which are an important contributor to a healthy diet for many Americans, are safe for consumers to eat and serve to their families.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Yiannas', with a long horizontal flourish extending to the right.

Frank Yiannas  
Deputy Commissioner  
Food Policy and Response