



# City of The Dalles Water Quality Lab

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Mid Columbia Growers:

I wanted to give you an update on the test method that The Dalles WQL (TDWQL) uses for the irrigation samples (agricultural water).

Those of you may be hearing conflicting information about the test method that is used and if it is a valid method in regards to GAP, Global GAP and Produce Safety Rule under FDA Food Safety Modernization Act (FSMA).

I have been in contact with the FDA and have a written response to this question. The Produce Safety Rule provides flexibility for covered farms to use any other scientifically valid method that is at least equivalent to a prescribed analytical method in accuracy, precision, and sensitivity. FDA reviewed EPA approved test methods to come to this decision.

The test method that TDWQL uses is an EPA (ORELAP) approved method under both the Clean Water Act and Drinking Water Act. The test method is SM 9223 B, which is listed under 40 CFR 136.6 Table IH (which is what FDA referred to in their response to me).

I would be more than happy to answer any questions, any of you may have and perhaps go into further detail about the test methods and particularly Produce Safety Rule. Please be aware that the FDA is still developing guidance documents to provide information to help industry comply.

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