

SETS OR
RECOMMENDS
SPECIFIC
MICROBIAL
STANDARDS FOR
IRRIGATION WATER

AGRICULTURAL WATER

FDA 1998 GUIDANCE

No

Growers may elect to test their water supply for microbial contamination on a periodic basis, using standard indicators of fecal pollution, such as *E. coli* tests. (II.B. 1.2)

CODEX PROVISIONS

No

GLOBALGAP STANDARDS

Where treated sewage water is used, water quality complies with the WHO published Guidelines for the Safe Use of Wastewater and Excreta in Agriculture and Aquaculture 1989. Also, when there is doubt if water is coming from a possibly polluted source (because of a village upstream, etc.) the grower has to demonstrate through analysis that the water complies with the WHO guideline requirements or the local legislation for irrigation water. (CB.6.3.1)

FSLC STANDARDS

Well Water: Generic *E. coli*: <1.1 MPN/100 mL is acceptable
Generic *E. coli*: ≥ 1.1 MPN/100 mL is Unacceptable water quality that requires immediate documented corrective and preventative actions. The water shall not be used for irrigation.

Surface Water: Generic *E. coli*: <1.1 MPN/100 mL is acceptable
Generic *E. coli*: ≥ 1.1 MPN/100 mL but <126 MPN/100mL and negative for pathogens is conditional and requires immediate documented corrective and preventative actions. The water shall not be used for irrigation.
Generic *E. coli*: ≥ 126 MPN/100 mL is Unacceptable water quality that shall not be used for irrigation.
(#1 under both Well Water and Surface Water Sources at p. 11)

LEAFY GREENS GUIDE

Generic *E. coli*: **Foliar Applications** (Whereby Edible Portions of the Crop ARE Contacted by Water (e.g. overhead sprinkler irrigation, pesticides/fungicide application, etc.): **Acceptance Criteria:** ≤126 MPN (or CFU)/100 mL (rolling geometric mean n=5) and ≤235 MPN/100mL for any single sample.

Non-foliar Applications Whereby Edible Portions of the Crop are NOT Contacted by Water (e.g., furrow or drip irrigation, dust abatement water; if water is not used in the vicinity of produce, then testing is not necessary): **Acceptance Criteria:** ≤126 MPN /100 mL (rolling geometric mean n=5) and ≤576 MPN /100 mL for any single sample. (Table 1. Water Use at p. 16-17)

FLORIDA TOMATO RULE

Ensure that any water being utilized for irrigation is not contaminated with animal or human feces and meets the standard for *E. coli* in recreational waters contained in 40 CFR Part 131.41(c). (TOMATO BEST PRACTICES MANUAL (TBPM) PART A(1)(c)(1)(a) at p. 5)

Any foliar application of water to tomatoes at the time of harvest shall meet the microbial standards for potable water contained in 40 CFR 141.63. (TBPM PART A(1)(c)(2)(a))

AGRICULTURAL WATER

...continued

SPECIFIES
REGULAR,
PERIODIC
WATER SAMPLING
AND MICROBIAL
TESTING

FDA 1998 GUIDANCE

No

Microbial testing of agricultural water may be of limited usefulness . . . appropriate microbiological testing may be useful for confirming water quality concerns in extreme situations (e.g., polluted water source) and in assessing the effectiveness of certain control programs (e.g., clean-up of well water). (II.B. 1.2)

CODEX PROVISIONS

No

Where necessary, growers should have the water they use tested for microbial and chemical contaminants. (3.2.1.1)

GLOBALGAP STANDARDS

The water analysis is carried out at a frequency according to the results of the risk assessment which takes the characteristics of the crop into account. (CB.6.3.3)

FSLC STANDARDS

Irrigation Water: Each water source (canal, reservoir, and well) shall be tested within 60 days of its first seasonal use.

Water samples are to be taken at the closest reasonable point of use. Monthly samples equate to sampling every 30 days. (#1 under Irrigation Water at p. 10)

Well Water: Microbiological testing of well water used for irrigation shall be at a minimum conducted on a monthly basis and at the onset of crop production. (#2 under Well Water at p. 11)

Surface Water: After baseline is established, if results of untreated surface water source meet acceptable water irrigation standards then test monthly when environmental conditions and management practices are consistently applied (e.g. no floods, heavy rains). (#2 under Surface Water Sources at p. 11)

LEAFY GREENS GUIDE

Pre-Harvest Water Use/ for Foliar Applications whereby edible portions of the crop are contacted by water as well as with non-foliar applications whereby edible portions of the crop are not contacted by water: One sample per water source shall be collected and tested prior to use if >60 days since last test of water source. Additional samples shall be collected no less than 18 hours apart and at least monthly during use from points within the distribution system. (Table 1. at p. 16)

Pre-Harvest Water Use/Non-foliar applications whereby edible portions of the crop are not contacted by water: One sample per water source shall be collected and tested prior to use if >60 days since last test of water source. Additional samples shall be collected no less than 18 hours apart and at least monthly during use from points within the distribution system. (Table 1. at p. 16-17)

FLORIDA TOMATO RULE

Growers shall test agricultural waters used with tomato production to minimize potential for microbial contamination.

- (i) Ground water shall be tested at least annually
 - (ii) Surface water shall be tested at least quarterly
- (TBPM PART A(1)(c)(3)(a) at p. 6)

AGRICULTURAL WATER

...continued

ASSESS
IMPACT OF
ADJACENT LAND
ON WATER
QUALITY

FDA 1998 GUIDANCE

Agricultural water is frequently a shared resource. In some regions, agricultural water comes from surface waters that travel some distance before reaching the produce growing area. While growers may not have control over factors that affect the watershed, awareness of potential problems helps determine which control options are most appropriate. In assessing water quality, operators should consider what affects their portion of the watershed. Growers may consider questions such as: What is the prevalence of animal production in the region? Do feedlots, animal pastures, and dairy operations in the region use fences or other barriers to minimize animal access to shared water sources? Is manure applied to land by many farms in the region? Do local rainfall patterns and topography impact the likelihood of contaminated runoff from these operations reaching surface waters? Are controls generally in place to minimize contamination of agricultural waters from other farm or animal operations?

At the individual field, orchard, or vineyard level, the topography of the land and current and historical use of adjacent lands all affect the potential for water to become contaminated, if pathogens are present, and for spreading pathogens to fruits and vegetables. Growers should evaluate their production areas in terms of their proximity to surrounding land uses that pose a potential for polluted runoff from heavy rainfall. (II.B.1.1)

CODEX PROVISIONS

No

GLOBALGAP STANDARDS

No

FSLC STANDARDS

A risk assessment is conducted to review surrounding land use that may impact water quality. The assessment takes into consideration possible contamination sources such as septic tanks, stored manure/compost, chemical/fertilizer storage and neighboring land use. (#7 under Irrigation Water at p. 10)

LEAFY GREENS GUIDE

Evaluate all land and waterways adjacent to all production fields for possible sources of human pathogen of concern. These sources include, but are not limited to, manure storage, compost storage, CAFOs, grazing/open range areas, surface water, sanitary facilities, and composting operations (see Table 6 for further detail). (3.1 at p. 13)

FLORIDA TOMATO RULE

[In section on the importance of water quality] Consideration should be given to topography, land history, adjacent land, and movement of animals. (Commodity Specific Guidelines for Tomatoes (CSGT) at p. 9)

GROWING FIELD

CONSIDER
PRIOR USE
OF GROWING
FIELD

FDA 1998 GUIDANCE

No

CODEX PROVISIONS

Where possible, growers should evaluate the previous uses of the sites as well as adjoining sites in order to identify potential microbial . . . hazards . . . If previous uses cannot be identified, or the examination of the growing or adjoining sites leads to the conclusion that potential hazards exist, the sites should be analysed for contaminants or concern. If the contaminants are at excessive levels and corrective or preventive actions have not been taken to minimize potential hazards, the sites should not be used until correction/control measures are applied. (3.1)

GROWING FIELD

...continued

GLOBALGAP STANDARDS

A documented risk assessment must be carried out when crops, livestock or aquaculture enterprises are to be introduced onto new sites. The risk assessment must be revised to take into account any new food safety risks. The risk assessment must take account site history (crops/stocking) and consider impact of proposed enterprises on adjacent stock/crops/environment. (AF.2.2.1)

FSLC STANDARDS

If the field has been used for purposes other than growing produce management shall, prior, to planting, conduct soil analysis to show results are within the limits per EPA, state, or local regulations for contaminants. (#1 under Growing Field at p. 4)

LEAFY GREENS GUIDE

To the degree practical, determine and document the historical land uses for production fields and any potential issues from these uses that might impact food safety (i.e. hazardous waste sites, landfills, etc.). (3.1 at p. 13)

FLORIDA TOMATO RULE

Tomato growers should determine previous usage of land if at all possible and should assess potential sources of contamination on land used. (TBPM PART A(1)(a)(3))

PROHIBITS
GROWING
ON FLOODED
LAND

FDA 1998 GUIDANCE

FDA considers ready to eat crops (such as lettuce) that have been in contact with flood waters to be adulterated due to potential exposure to sewage, animal waste, heavy metals, pathogenic microorganisms, or other contaminants. FDA is not aware of any method of reconditioning these crops that will provide a reasonable assurance of safety for human food use or otherwise bring them into compliance with the law. Therefore, FDA recommends that such crops be excluded from the human food supply and disposed of in a manner that ensures they do not contaminate unaffected crops during harvesting, storage, or distribution. (CFSAN/Office of Plant and Dairy Foods, Letter to California Firms that Grow, Pack, Process, or Ship Fresh and Fresh-cut Lettuce (Nov. 4, 2005))

CODEX PROVISION

No

GLOBALGAP STANDARDS

No

FSLC STANDARDS

If fields are flooded due to natural causes, the product, excluding tree crops and stone fruit, shall not be harvested for human consumption. In addition, there must be documented testing results prior to replanting to ensure soil meets EPA and all regulatory standards. (#2 under Growing Field at p. 4)

LEAFY GREENS GUIDE

Buffer and do not harvest any produce within 30 ft of the flooding. Required buffer distance may be greater than 30 feet based on risk analysis by food safety professional.

If there is evidence of flooding, the production block must undergo a detailed food safety assessment by appropriately trained food safety personnel . . . prior to harvest.

The time interval before planting can commence following the receding of floodwaters is 60 days prior to planting provided that the soil has sufficient time to dry out. Appropriate soil testing can be used to shorten this period. (Table 4 at p. 42)

FLORIDA TOMATO RULE

No

MANURE

PROHIBITS USE OF RAW MANURE

FDA 1998 GUIDANCE

No

Applying raw manure or leachate from raw manure, to produce fields during the growing season prior to harvest is not recommended . . . Where it is not possible to maximize the time between application and harvest, such as for fresh produce crops which are harvested throughout most of the year, raw manure should not be used. (III.B.2.2.1)

CODEX PROVISIONS

No

Manure, biosolids and other natural fertilizers which are untreated or partially treated may be used only if appropriate corrective actions are being adopted to reduce microbial contaminants such as maximizing the time between application and harvest of fresh fruits and vegetables. (3.2.1.2)

GLOBALGAP STANDARDS

No

(Only human sewage sludge is prohibited. (CB.5.6.1))

FSLC STANDARDS

Raw or incompletely composted manure . . . or leachate (teas) from raw manure must not be used. (#1 under Fertilizer Use at p. 8)

LEAFY GREENS GUIDE

DO NOT USE raw manure or soil amendment that contain un-composted, incompletely composted or non-thermally treated animal manure to fields which will be used for lettuce and leafy green production. (6.1 at p. 23) If these materials have been applied to a field, wait one year prior to producing leafy greens. (Table 2 at p. 25)

FLORIDA TOMATO RULE

No

No raw animal manure or leachate from raw material should be used to supplement the soil. (CSGT at 10)

SETS SPECIFIC STANDARD FOR COMPOSTING MANURE

FDA 1998 GUIDANCE

No

Growers should follow good agricultural practices for handling animal manure to reduce the introduction of microbial hazards to produce. (III.B.2.0)

CODEX PROVISIONS

No

Adopt proper treatment procedures (e.g. composting, pasteurization, heat drying, UV irradiation, alkali digestion, sun drying or combinations of these) that are designed to reduce or eliminate pathogens in manure, biosolids and other natural fertilizers. (3.2.1.2)

GLOBALGAP STANDARDS

No

FSLC STANDARDS

Manure should be composted or aged per 40 CFR Sec. 503.32.

Acceptance criteria for composted soil amendments:

Generic *E. coli* <10 MPN/gram

Salmonella Negative

E. coli O157:H7 Negative

Shigella Negative

(#2 under Fertilizer Use at p.8)

MANURE

...continued

LEAFY GREENS GUIDE

Acceptance Criteria

Fecal coliforms <1000 MPN/gram

Salmonella Negative or <DL (<1/30 grams)*E. coli* O157:H7 Negative or <DL (<1/30 grams) (Table 2 at p. 25)**FLORIDA TOMATO RULE**

No

Only properly composted manures are allowed for use in tomato fields and greenhouses. (TBPM Part A (1)(e)(a))

REQUIRES OR RECOMMENDS SAMPLING AND TESTING**FDA 1998 GUIDANCE**

No

CODEX PROVISIONS

No

GLOBALGAP STANDARDS

No

FSLC STANDARDS

Compost monitoring plan shall outline sample collection procedures to define how a representative compost sample is collected and sampled for each lot of compost. Sampling and microbiological testing plans must be validated based on prescribed composting procedures. (#3 and #4 under Fertilizer Use at p. 8)

LEAFY GREENS GUIDE

12 point sampling plan composite sample (divide each lot/pile into a 3 x 4 grid and extract 12 equivolume samples.)

- Sample may be taken by the supplier if trained by the testing laboratory.
- Laboratory must be certified/accredited for microbial testing by an appropriate process authority.

Testing Frequency: Each lot before application to production fields. A lot is defined as a unit of production equal to or less than 5,000 cubic yards. (Table 2 at p. 26)

FLORIDA TOMATO RULE

No

STORE AND TREAT MANURE AWAY FROM GROWING AREA**FDA 1998 GUIDANCE**

Manure storage and treatment sites should be situated as far as practicable from fresh produce production and handling areas. (III.B.2.2)

CODEX PROVISIONS

Avoid locating treatment or storage sites in proximity to fresh fruit and vegetable production areas. Prevent cross-contamination from runoff or leaching by securing areas where manure, biosolids, and other natural fertilizers are treated and stored. (3.2.1.2)

GLOBALGAP

No

MANURE

...continued

FSLC STANDARDS

Compost/manure shall be stored so that it does not become a potential source of contamination. (#12 at p. 9)

LEAFY GREENS GUIDE

Due to lack of science at this time, an interim guidance distance of 400 ft from the edge of crop is proposed. This number is subject to change as science becomes available. This distance may be either increased or decreased depending on risk and mitigation factors (in table on “Crop Land and Water Source Adjacent Land Use.”)(Table 6 at p. 49)

FLORIDA TOMATO RULE

No

ANIMAL CONTROL

**EXCLUDES
ANIMALS FROM
GROWING AREAS**

FDA 1998 GUIDANCE

Domestic animals should be excluded from fresh produce fields, vineyards, and orchards during the growing season. May include keeping livestock confined (e.g., in pens or yards) or preventing their entry into fields by using physical barriers such as fences.

To the extent possible, where high concentrations of wildlife are a concern, growers should consider establishing good agricultural practices to deter or redirect wildlife to areas with crops that are not destined for the fresh produce market. (III.B.3.0)

CODEX PROVISIONS

Existing practices should be reviewed to assess the prevalence and likelihood of uncontrolled deposits of animal feces coming into contact with crops. Considering this potential source of contamination, efforts should be made to protect fresh produce growing areas from animals. As far as possible, domestic and wild animals should be excluded from the area. (3.1)

GLOBALGAP STANDARDS

No

FSLC STANDARDS

No animals of significant public health concern (domestic and/or wild animals to include: livestock, dogs, horses, pigs, deer, etc.) are permitted within the area of growing, packing and cooling operations. If animals were to gain access to the growing fields, management must take immediate corrective action to remove the animals and isolate and destroy any product potentially contaminated by the animals. All feces left behind require removal along with the contaminated soil. A “Notice of Unusual Occurrence and Corrective Action” report shall be completed that details the date and time of occurrence, description of incident, corrective action, person notified, person responsible, and the preventive measures implemented to prevent reoccurrence. If evidence of animal activity is present or the hazard analysis identifies animal activity as a hazard then physical barriers or other measures (such as sound cannons) are required to prevent animals from entering the field. (#1 and #2 under Animal Control at p. 6)

ANIMAL CONTROL

...continued

LEAFY GREENS GUIDE

DO NOT harvest areas of fields where unusually heavy activity by animals of significant risk occurs. If animal of significant risk intrusions are common on a particular production field, consider fencing, barriers, noisemakers, and other practices that may reduce intrusions. (14.1 at p. 45)

FLORIDA TOMATO RULE

Domestic animals should be excluded from tomato fields. Evaluate the need for bare soil buffers between your tomato fields and water sources and/or adjacent land. Buffer zones can discourage the movement of reptiles, amphibians, and rodents. (CSGT at p. 10)

REQUIRES SET
DISTANCE
FROM CAFOs**FDA 1998 GUIDANCE**

No

CODEX PROVISIONS

No

GLOBALGAP STANDARDS

No

FSLC STANDARDS

Concentrated animal feed lots require at least one mile distance from end of crop rows. Distance may vary only if the completed risk assessment takes into account variables that influence potential for contamination such as: topography of land, water run-off, ground sloped or graded away from growing field, physical barriers (such as fences, ditches, mounds, berms or bare soil buffers). (#6 in Animal Control at p. 7)

LEAFY GREENS GUIDE

Due to lack of science at this time, an interim guidance distance of 400 ft from the edge of crop is proposed. This number is subject to change as science becomes available. The proximate safe distance depends on the risk/mitigation factors listed. (Table 6 at p. 49)

FLORIDA TOMATO RULE

No

WORKER HEALTH AND HYGIENEPROHIBITS
SMOKING, EATING,
SPITTING, GUM
CHEWING IN
GROWING AREAS**FDA 1998 GUIDANCE**

No

CODEX PROVISIONS

Agricultural workers should refrain from behavior which could result in the contamination of food, for example: smoking, spitting, chewing gum or eating, or sneezing or coughing over unprotected fresh fruits and vegetables. (3.2.3.4)

GLOBALGAP STANDARDS

The [hygiene] instructions must at least include: limitation on smoking, eating and drinking to certain areas. (AF. 3.2.5)

FSLC STANDARDS

Eating, drinking, chewing gum/tobacco, candy and smoking are prohibited in the growing areas. (#10 at p. 5)

WORKER HEALTH AND HYGIENE**LEAFY GREENS GUIDE**

Establish a written worker practices program (i.e., an SOP) that can be used to verify employee compliance with company food safety policy. This program shall establish the following practices for field and harvest employees as well as visitors: Confinement of smoking, eating and drinking of beverages other than water to designated areas. (10.1. at p. 38)

FLORIDA TOMATO RULE

Eating and drinking should be prohibited in production areas because they may attract pests. Smoking should also be prohibited. (CSGT at p. 11)

SPECIFIES
LOCATION OF
TOILETS

FDA 1998 GUIDANCE

Operators should operate their facilities or farms in accordance with the laws and regulations that describe field sanitation practices. OSHA rules 29 CFR 1928.110, subpart I, describe the . . . maximum worker-to-restroom distance (1/4 mile). (V.B.)

CODEX PROVISIONS

No

Hygienic and sanitary facilities should . . . [b]e located in close proximity to the fields and indoor premises and in sufficient number to accommodate personnel. (3.2.3.1)

GLOBALGAP STANDARDS

Fixed or mobile toilets (including pit latrines) constructed of materials that are easy to clean and with catch basins designed to prevent contamination in the field are accessible to harvest workers within 500m and they are in a good state of hygiene. Where an employee is working independently, the 500m distance can be modified to allow the presence of toilets at an increased distance, providing that there is reasonable and adequate transport available to the worker. (FV.4.1.8)

FSLC STANDARDS

A sufficient number (one per every 20 employees per gender) of stationary or portable toilet facilities must be within ¼ mile of all workers. (#1 under Field Sanitation and Facilities at p. 6)

LEAFY GREENS GUIDE

No

A field sanitary facility program (i.e. an SOP) shall be implemented and it should address the following issues: the number, condition, and placement of field sanitation units. (10.1 at p. 39)

FLORIDA TOMATO RULE

Follow all OSHA and/or FDA Title 21 CFR 110 requirements for sanitary facilities. (Also references Florida Department of Health, Rule 64E-14.016, F.A.C. requirements for field sanitary facilities.) (Part A(1)(d)1.a at p. 6) (The facility shall be located within a one-quarter-mile walk of any hand-laborer's place of work in the field.) (TBPM PART A(1)(d)1.a)

REQUIRES
DESTRUCTION OF
PRODUCT THAT
COMES IN CONTACT
WITH BLOOD OR
BODILY FLUIDS

FDA 1998 GUIDANCE

No

CODEX PROVISIONS

No

GLOBALGAP STANDARDS

No

WORKER HEALTH AND HYGIENE

...continued

FSLC STANDARDS

A written policy must exist requiring all products to be destroyed that come in contact with blood or other bodily fluids. (#19 at p. 6)

LEAFY GREENS GUIDE

No

Growers must “establish a worker health practices program (i.e., an SOP) that address . . . (a) policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.”(10.1. at p. 39)

FLORIDA TOMATO RULE

No

FIELD SANITATION

**SANITIZE OR
DISINFECT
HARVESTING
EQUIPMENT AND
TEST/VERIFY
EFFICACY OF
SANITATION**

FDA 1998 GUIDANCE

No

- Containers used to transport ready-to-eat produce should be routinely cleaned and sanitized.
- Any equipment used to haul garbage, manure, or other debris should not be used to haul fresh produce or contact the containers or pallets that are used to haul fresh produce without first being carefully cleaned and sanitized.
- Harvest containers used repeatedly during a harvest should be cleaned after each load is delivered and prior to reuse. If the containers are stored outside, they should be cleaned and sanitized before being used to haul fresh produce.
- Containers used for ready-to-eat fresh produce should be cleaned and sanitized.
- If harvest containers are stored outside the packing facility, they should be cleaned and sanitized before use. (VI.B.1.0 and 2.0)

CODEX PROVISIONS

No

Harvesting equipment and re-usable containers that come in contact with fresh fruits and vegetables should be cleaned, and, where appropriate, disinfected on a regular basis. (3.4.1)

GLOBALGAP STANDARDS

No

Reusable harvesting containers, harvesting tools, . . . and harvesting equipment . . . are cleaned and maintained, and a cleaning and disinfection schedule is in place (at least once a year) to prevent produce contamination . . . (FV.4.1.5)

FSLC STANDARDS

There is a documented preventive maintenance program to keep facilities, harvest equipment and machinery in sanitary and operational condition.

There is a Master Sanitation Schedule and written Sanitation Standard Operating Procedures (SSOPs) for the harvesting machinery and equipment. Records indicate that the plan is properly and consistently executed. SSOPs include a list of harvest equipment, cleaning frequency, chemical name, concentrations used and detailed step-by-step instructions for equipment sanitation.

FIELD SANITATION

...continued

There is a microbiological indicator (adenosine triphosphate, coliforms, etc) monitoring program to verify efficacy of sanitation program for harvesting machinery and equipment. Program identifies monitoring methods, sampling plan, frequency of testing, acceptable limits and corrective actions when limits are exceeded. (#15-17 under Harvest Practices at p. 13-14)

LEAFY GREENS GUIDE

The Best Practices Are: Prepare an SOP for harvest equipment that addresses the following: Sanitation verification and periodic microbial swabs or other equivalent indicator . . . Evaluate the use of cleaning verification methods for harvesting equipment (e.g., 646 ATP test methods). (8.1 at p.36-37)

FLORIDA TOMATO RULE

No

Clean and sanitize all food contact surfaces and harvest containers or bins as needed. (Commodity Specific Guide at p. 11)

Only those (packing) containers that can be easily cleaned and sanitized shall be used for field harvest.

Clean and sanitize harvest containers or bins at least weekly, more often if needed. (TBPM PART A(1)(f)1.b(iii))

**DISPOSE OF
DAMAGED
HARVESTING
CONTAINERS****FDA 2008 GUIDANCE**

Discard damaged containers that are no longer cleanable in an effort to reduce possible microbial contamination of fresh produce. (VI.B.1.0)

CODEX PROVISIONS

Containers that can no longer be kept in a hygienic condition should be discarded. (3.2.4)

GLOBALGAP STANDARDS

No

FSLC STANDARDS

No

LEAFY GREENS GUIDE

No

Prepare an SOP for handling and storage of product containers that addresses damaged containers. (8.1 at p. 36)

FLORIDA TOMATO RULE

No