



Current Food Safety Landscape

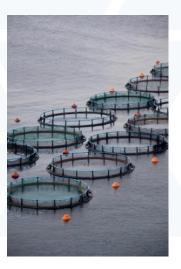




David Acheson, President & CEO, The Acheson Group

Overview

- Biggest challenges in food safety
- Approaches to assessing risks
- Approaches to managing risk
- Leveraging technology





Challenges

- Constant innovation
- Consumer demands
 - -Low cost
 - -Zero risk
 - -Exciting flavors
- Economic pressures
- Continued growth
- Being familiar with the current challenges
- Brand protection





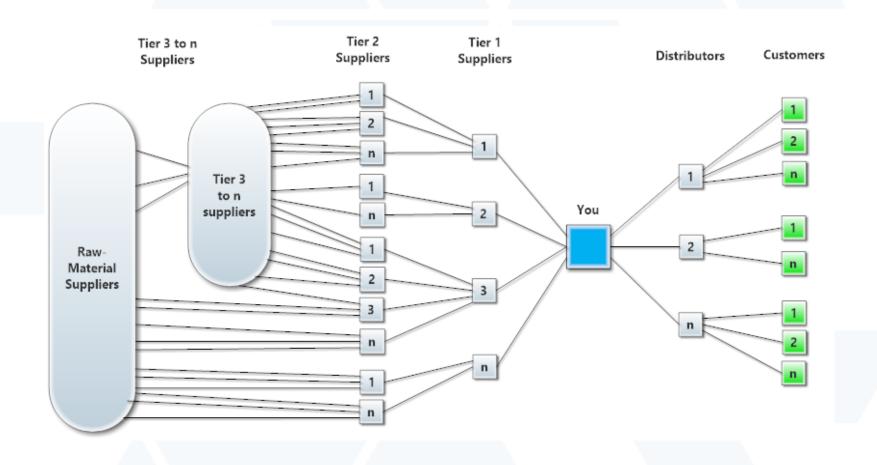
The Changing Food-Safety Landscape

- Complex supply chains
- Consumer demands
- Emerging threats
- Improving epidemiology
- Influence of media
- Litigation
- Regulatory changes
- Criminal prosecutions





Supply Chain Risks





Key Questions

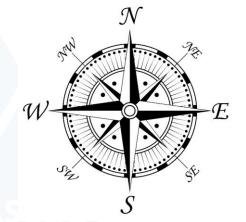
- Do you have adequate understanding of the risks
- Do you know who is really controlling the risk in your supply chain
- Are you able to track all the information you receive
 - Checking COAs
 - Reviewing third party audits
- Who is in charge of the supply chain





Changing Science of Food Safety

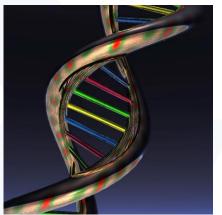
- Drug residues
- Chemicals
- Heavy metals
- New microbes being found
 - E. coli 0104
 - E coli 0121
- Antibiotic resistance challenges
- Allergens





Changing Science of Food Safety

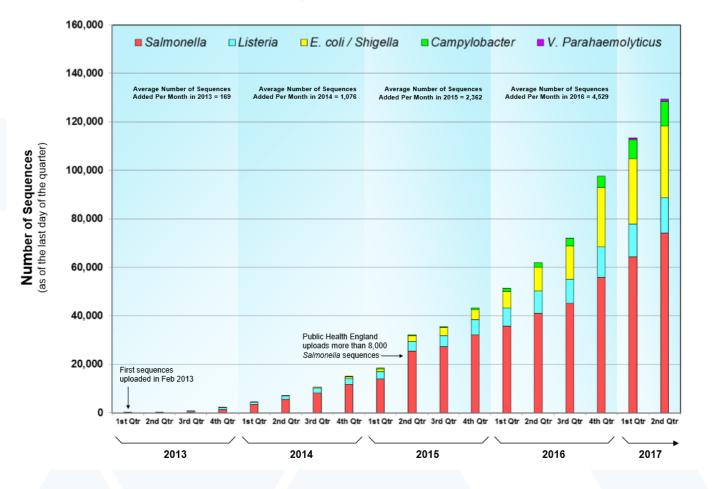
- New risks identified with foods
 - Peanut in flour/cumin
 - Is anything not RTE
- Greater capacity to link food with illness
- Ability to measure lower levels of chemicals
- Whole genome sequencing
- Linking specific isolates with illness





Whole Genome Sequencing

Total Number of Sequences in the GenomeTrakr Database





Whole Genome Sequencing

Labs Outside the U.S. Contributing to GenomeTrakr





WGS Scenario

- February 2016 regulators find Salmonella in your facility in zone 3 during a routine visit.
- September 2017 CDC uploads the Salmonella genome from a single human illness case
- The two isolates match
- What happens next





Consumers

- Consumer view of science
- Move toward clean labels
- Understanding risks
 - Preservatives vs no preservatives
- Thought leaders and "agitators"
- Demonization of processed food





Consumer Expectations and Media Influence

- Consumers expect all types of food will be available all the time
- Zero tolerance for unsafe food
- Consumers place responsibility for safe food on the producer
- Increased desire for local and unprocessed food
- Consumers ability to damage a brand
 - Main stream media
 - Social media





New Regulations

- Food Safety Modernization Act in the US
- New regulations in Canada
- Moving from reaction to prevention
- Focusing on corporate responsibility
- Greater consequences
- Holding companies accountable





Other Key Players

- Center for Disease Control
- State regulators
- Consumer organizations
- Congress
- Department of Justice





Litigation

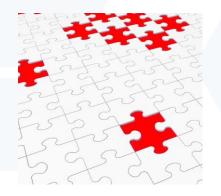
- Let CDC do the work
- Going after the deep pockets
- Strict liability
- Doesn't matter where you are in the supply chain





Criminal Investigations

- Peanut Corporation of America Salmonella
- ConAgra Salmonella
- Jensen Farms Listeria
- Iowa egg company Salmonella
- Bluebell Ice-cream Listeria
- Chipotle Norovirus
- Dole Listeria





High Risks

- Congress has made it a prohibited act to introduce adulterated food into interstate commerce
- This is a strict liability offense, meaning that a company or individual who violates the law and can face misdemeanor charges whether or not it intended to distribute adulterated food





Regulatory Procedures Manual

		11.9	U.S. Food and Drug Administration Protecting and Promoting <i>Your</i> Health					A to Z Index Follow FDA En Español		
F		Pro							Q	
	Home	Food	Drugs	Medical Devices	Radiation-Emitting Products	Vaccines, Blood & Biologics	Animal & Veterinary	Cosmetics	Tobacco Products	

Inspections, Compliance, Enforcement, and Criminal Investigations

Home > Inspections, Compliance, Enforcement, and Criminal Investigations > Compliance Manuals > Regulatory Procedures Manual

Regulatory Procedures Manual

6-5 - PROSECUTION

-Misdemeanor prosecutions, particularly those against responsible corporate officials, can have a strong deterrent effect on the defendants and other regulated entities.....

https://www.fda.gov/downloads/ICECI/ComplianceManuals/RegulatoryProcedures Manual/UCM074317.pdf



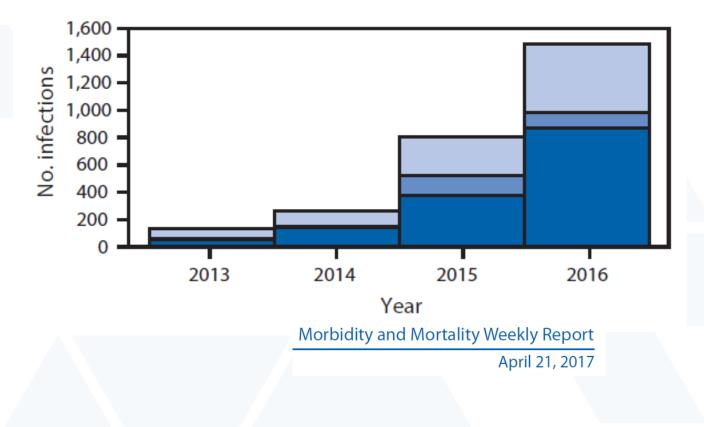
- Centers for Disease Control use FoodNet to track human foodborne illness
- First used in 1996
- Captures illness from nine important foodborne agents
- Tracks illness in approximately 45 million people in 10
 states
- Annual report of trends
- Indications for regulatory focus and where the risks are





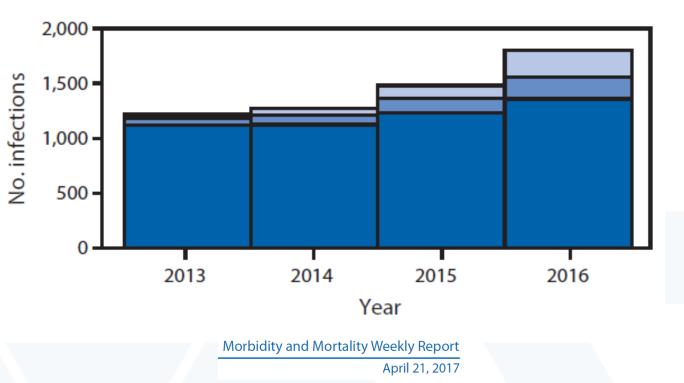
•2016 FoodNet data

Salmonella





•2016 FoodNet data



STEC[¶]



2016 FoodNet data – percent changes
 2016 vs 2013-2015 averages

Pathogen	2016 IR [¶]	% Change**	
Campylobacter	11.79	-11	
Listeria ^{††}	0.26	+4	
Salmonella	15.40	+2	
Shigella	4.60	+7	
STEC ^{¶¶}	2.84	+21	
Vibrio	0.45	+2	
Yersinia	0.42	+29	
Cryptosporidium	3.70	+45	

Morbidity and Mortality Weekly Report April 21, 2017



Major Causes of Trouble

- Supply chain failures
- Labeling mistakes
- Environmental contamination of ready to eat foods





Approach to Risk

- Assess risks
- Prioritize risks
- Manage risks





Continuous Improvement

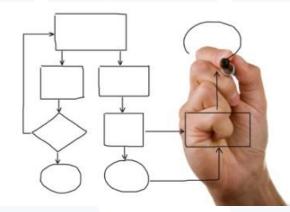
Reactive

Preventive



Approach to Managing Risks

- Limited resources, so need to identify top priority risks
- Not all risks are the same
- Some risks are tolerable
- Some risks need to be managed aggressively
- How to approach risk
 - Assess the risk
 - Manage the risk





Risk Management Approach



Supply Chain Risk

- How do you determine risk in your supply chain?
- Not all suppliers are equal risk
- How do you differentiate?



- Focus resources on the areas of greatest risk
- Multiple factors impact risk



Managing Risks

Ingredient risk

- Hazard analysis
- History

Supplier risk

- On site information
- Document review
- History

Manage Supply Chain Risk

Your use of the ingredient

- Processing
- Volumes
 - Exposure



New Products/New Suppliers

- Work as a team
 - Product development/ R and D
 - Food Safety
 - Procurement
 - Supply chain
- Understand product risk, supplier risk, exposure to you
- Manage the risk accordingly
 - May need more resources
 - May decide not to go there





Current Suppliers

- Track and trend data
 - Timeliness of delivery
 - Meeting specifications
 - COAs
- Take corrective actions
 - Warnings
 - Site visits
 - Change supplier
- Keep records





Environmental Monitoring

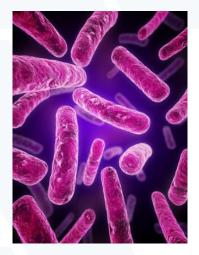
- Think like a bug
- Look for trends in your results
 - -Too many negatives
 - -Too many positives
 - -Do you have places you are not looking
- Connect the dots
- Look for trouble
- Where would the regulators test
- React to positive results





Reacting to Positive Results

- Appropriate cleaning and sanitation
- Vectoring
- Root cause analysis
- Re-testing
- Challenge of getting more positive results
- How far do you go to determine cause
- Should you undertake whole genome sequencing
- Look at alternate technology such as HPP





Summary

- Senior executives and food safety professionals have to mange many different aspects or risk
- Leverage new technology such as HPP
- Stay current with multiple challenge areas
- Building relationships
- Prevention focus with strong reactive capabilities
- The need for a strategic and holistic approach
- Setting the right culture





Thank You!