



#### Current Food Safety Landscape

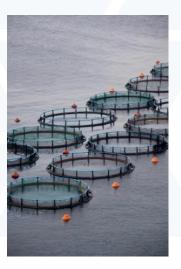




David Acheson, President & CEO, The Acheson Group

### **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





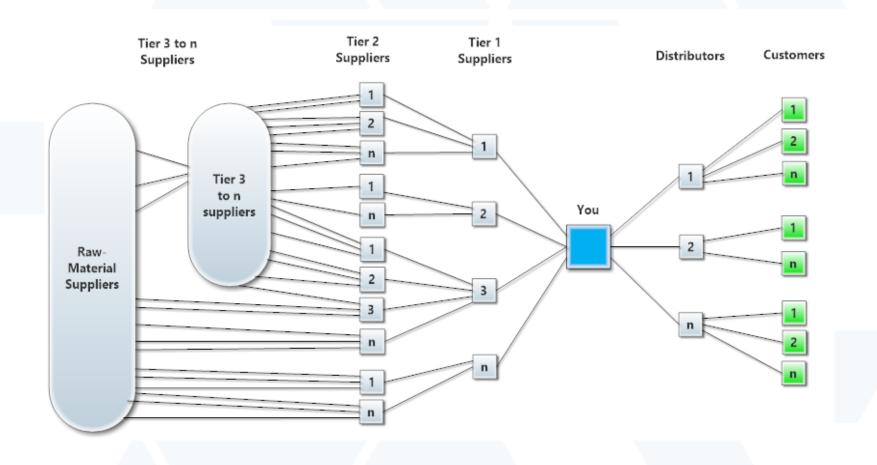
# The Changing Food-Safety Landscape

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





# **Supply Chain Risks**





# **Key Questions**

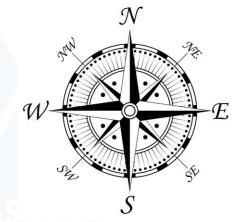
- Do you have adequate understanding of the risks
- Do you know who is really controlling the risk in your supply chain
- Are you able to track all the information you receive
  - Checking COAs
  - Reviewing third party audits
- Who is in charge of the supply chain





# **Changing Science of Food Safety**

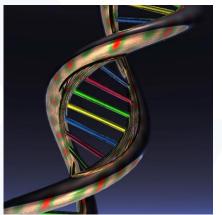
- Drug residues
- Chemicals
- Heavy metals
- New microbes being found
  - E. coli 0104
  - E coli 0121
- Antibiotic resistance challenges
- Allergens





# **Changing Science of Food Safety**

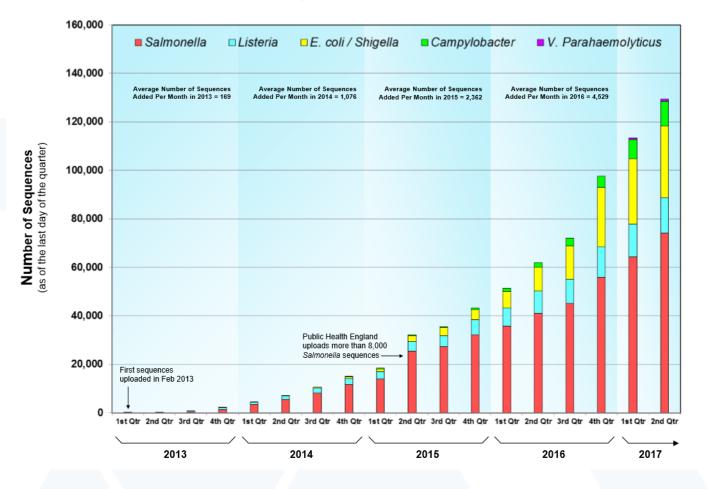
- New risks identified with foods
  - Peanut in flour/cumin
  - Is anything not RTE
- Greater capacity to link food with illness
- Ability to measure lower levels of chemicals
- Whole genome sequencing
- Linking specific isolates with illness





#### **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

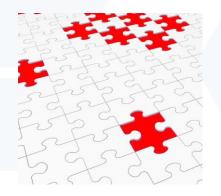
- Let CDC do the work
- Going after the deep pockets
- Strict liability
- Doesn't matter where you are in the supply chain





# **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



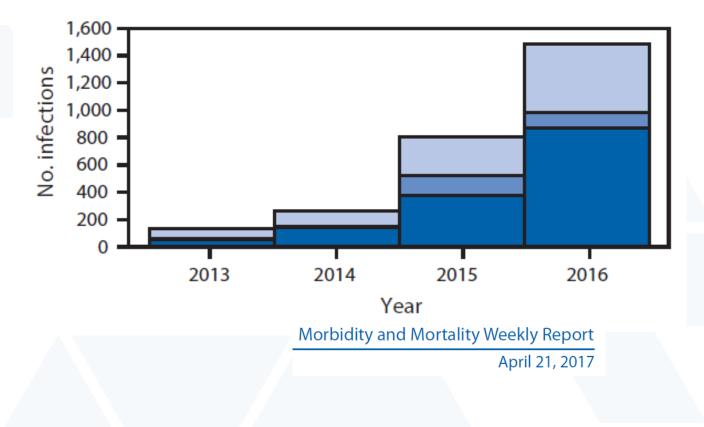
- Centers for Disease Control use FoodNet to track human foodborne illness
- First used in 1996
- Captures illness from nine important foodborne agents
- Tracks illness in approximately 45 million people in 10
  states
- Annual report of trends
- Indications for regulatory focus and where the risks are





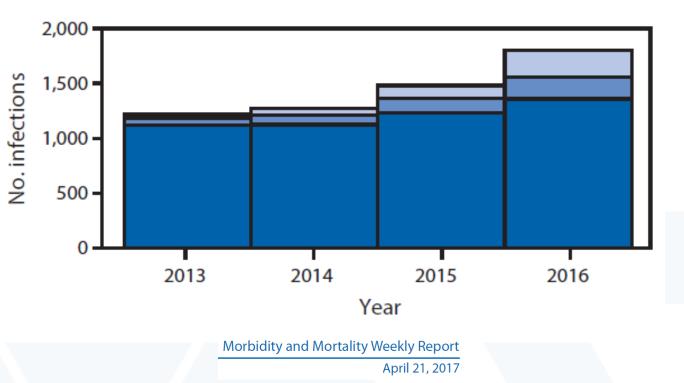
#### •2016 FoodNet data

Salmonella





•2016 FoodNet data



STEC<sup>¶</sup>



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

Pathogen	2016 IR <sup>¶</sup>	% Change**	
Campylobacter	11.79	-11	
Listeria <sup>††</sup>	0.26	+4	
Salmonella	15.40	+2	
Shigella	4.60	+7	
STEC <sup>¶¶</sup>	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**

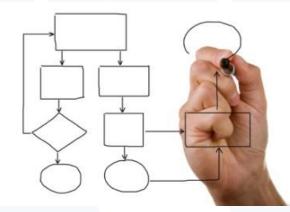
# Reactive

# 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!**