

# **NEARS: Identifying environmental factors contributing to foodborne illness outbreaks**

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Services (DEEHS)  
Environmental Health Services Branch**

# Presentation overview

- **CDC's National Center for Environmental Health (NCEH)**
- **Environmental factors contributing to foodborne illness outbreaks**
- **Outbreak environmental assessments**
- **Support for environmental assessments- training**
- **Collection and analysis of environmental assessment data - National Environmental Assessment Reporting System (NEARS)**
- **Benefits of NEARS**

# NCEH Objectives

- **Support environmental health practitioners to prevent environmental exposures and protect health.**
- **Work with state and local health departments to identify and address environmental factors contributing to foodborne and waterborne illness outbreaks.**

# NCEH Food Safety Objectives

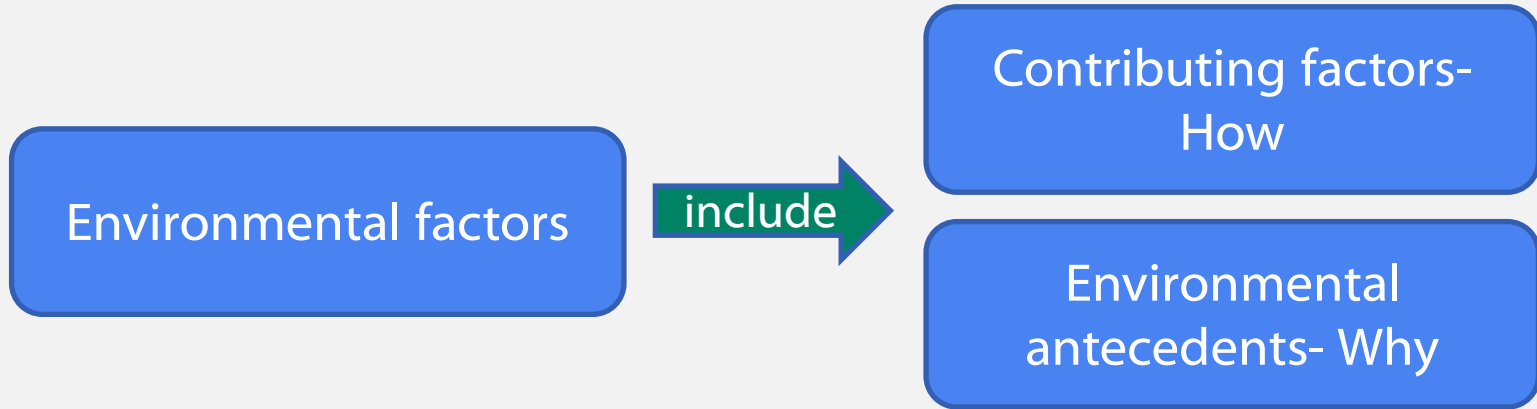
Improve identification and reporting of environmental factors contributing to foodborne illness outbreaks

through

Support of environmental assessments at the state and local level

Collection and analysis of environmental assessment data at the national level

# Environmental factors contributing to outbreaks



# Environmental factors contributing to outbreaks

## Contributing factors

### Contamination

- Cross-contamination of ingredients
- Contact by an infectious/ill worker

### Proliferation

- Improper cold holding due to malfunctioning equipment
- Improper cold holding due to improper procedure

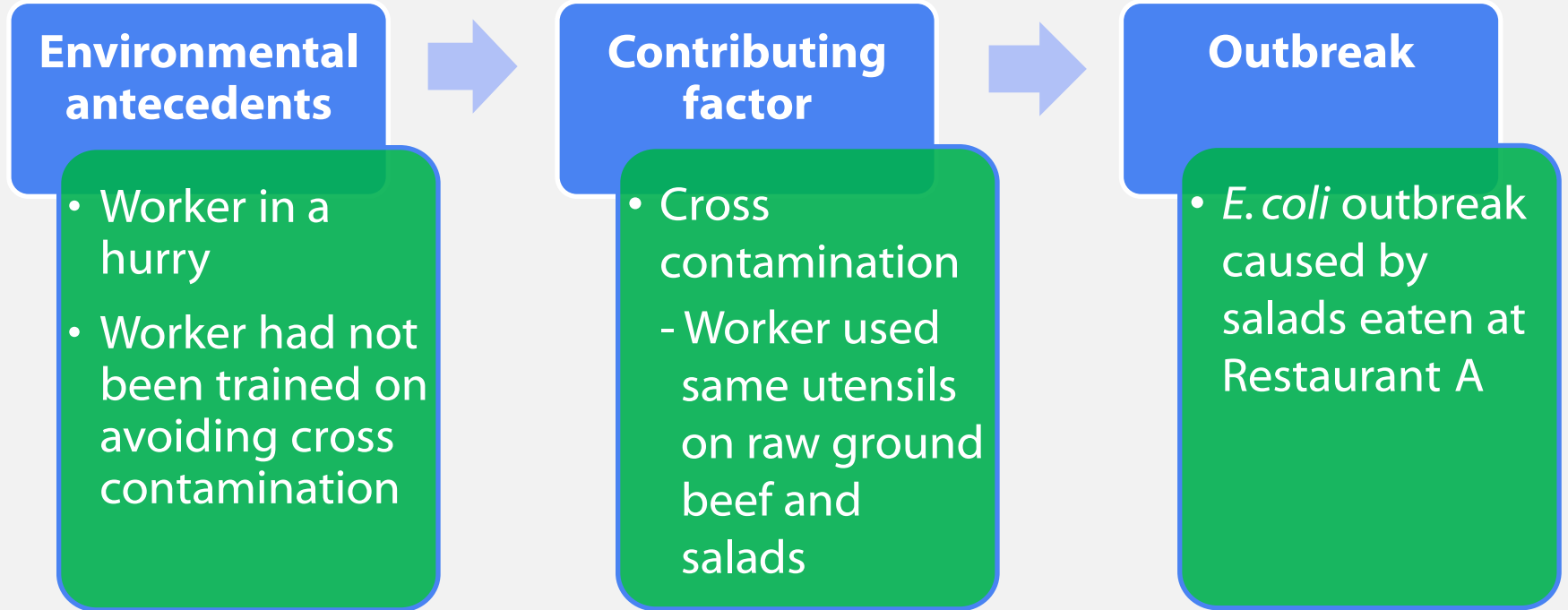
### Survival

- Insufficient time/temp during reheating
- Insufficient time/temp during freezing

## Environmental antecedents

- People
- Processes
- Equipment
- Economics

# Environmental factors contributing to outbreaks



# Outbreak environmental assessments

Describe how the environment contributes to the introduction and transmission of illness agents

Are conducted by environmental health program staff

Involve a thorough review of the processes and practices used with suspected food items

Are guided by known information about the outbreak (e.g., agent)

May include food flows, staff interviews, observations of food preparation, sampling

Generate recommendations for intervention



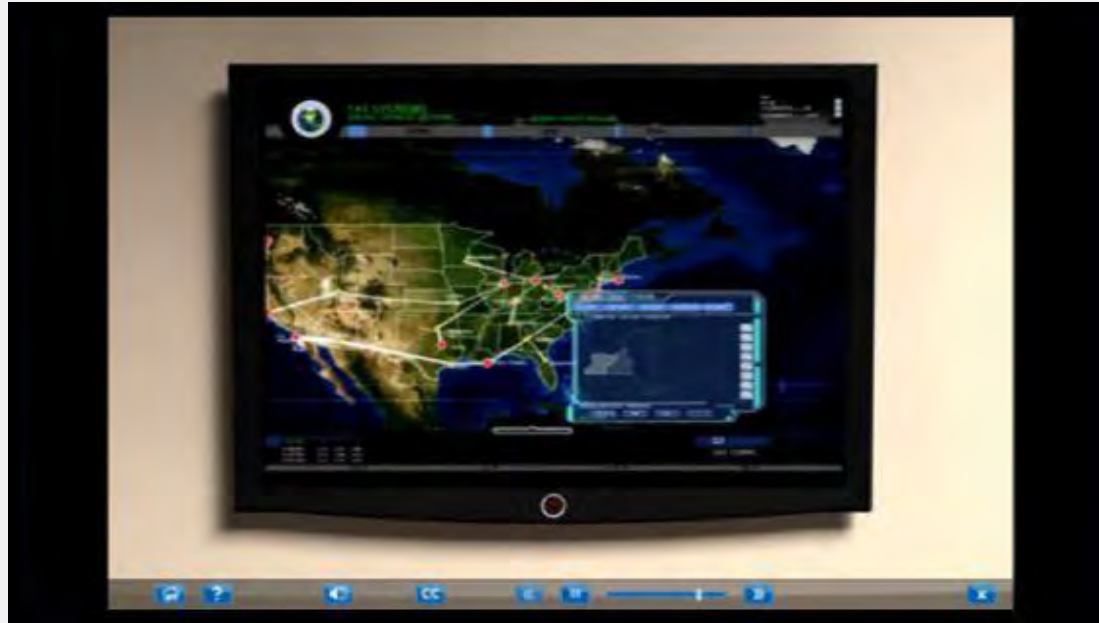
# Support of environmental assessments at the state and local level

## Development and launch of environmental assessment training

- Designed to improve environmental health programs' competency in conducting environmental assessments during outbreaks
- 5,100 people from over 1,200 federal, state, local government agencies have registered for the training
- Free, web-based, interactive
- Participants show a 25 percentage point increase in pre to post test scores



# Environmental assessment training



<http://ow.ly/HnnxJ>

# Environmental assessment training

**Question Category**

1. Tasks Performed by this FW
2. Establishment Policies
3. Food Safety Training
4. Personal Health
5. Personal Handwashing/Hygiene
6. Personal Use of Gloves

Thinking back about 5 days ago, what tasks did you perform?

**Average question effectiveness** 100%

**Score** 4%

5 / 125 points

**TIME REMAINING** 9:20

END INTERVIEW



**Left Beef Stew**

- Take temperature
- Get depth of stew
- Get additional info

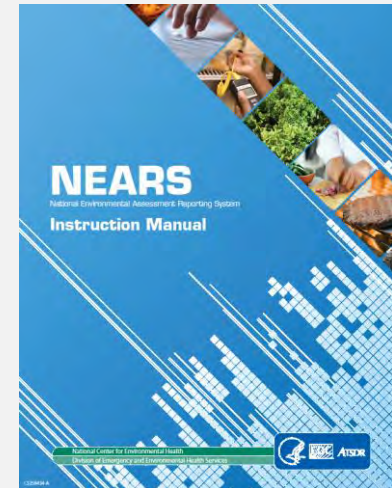
58°F

OK

# Collection and analysis of environmental assessment data at the national level

## Development and launch of National Environmental Assessment Reporting System (NEARS)

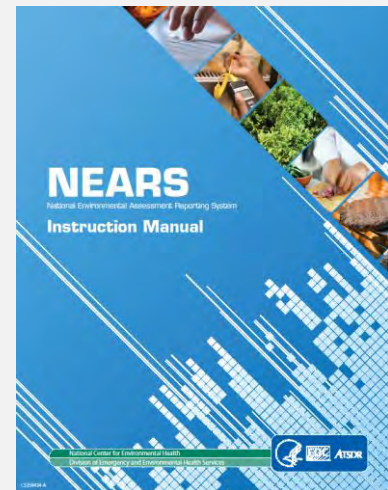
- Repository for state and local programs to report data collected from their environmental assessments
- 25 state and local agencies are currently reporting data into NEARS



# Collection and analysis of environmental assessment data at the national level

Programs report data into NEARS from environmental assessment:

- Interviews
- Observations
- Food and environmental sampling



# Short-term benefits of NEARS

**Annual report from  
CDC summarizing  
your NEARS data**

**Collaboration/  
communication with  
other states/localities  
participating in  
NEARS**

**Potential scientific  
publication  
opportunities**

**Ability to document  
and track foodborne  
outbreak response  
data**

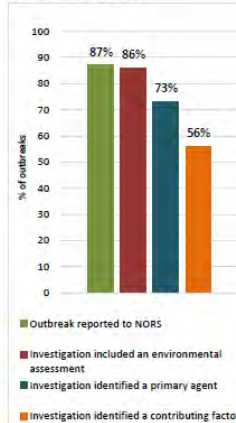
# NEARS annual report

## National Environmental Assessment Reporting System (NEARS) 2014 Summary Report

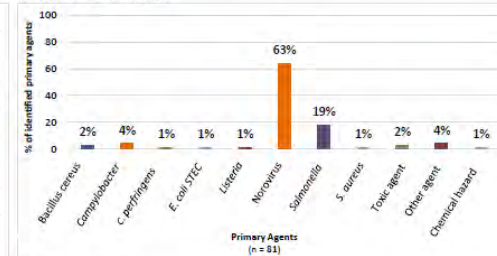
In 2014, a total of 110 outbreaks were reported to NEARS. This summary provides information on those outbreaks' characteristics, investigations, primary agents, contributing factors, and establishment characteristics. The data included in this summary was collected by NEARS participants in California, Connecticut, Minnesota, New York City, New York State, Rhode Island, Tennessee, and Wisconsin.

### Outbreak Characteristics

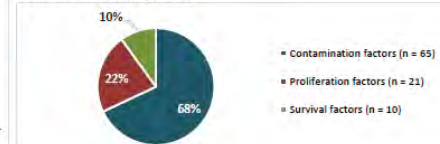
#### Outbreak investigation



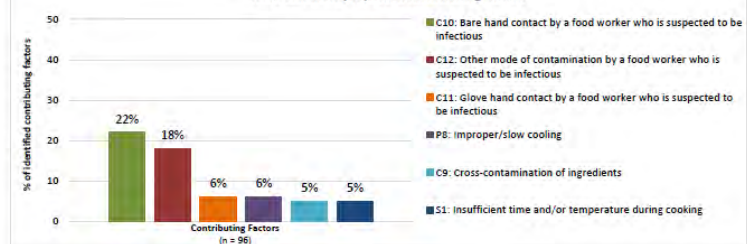
#### Outbreak primary agents



#### Outbreak contributing factors



#### Most commonly reported contributing factors



# Long-term benefits of NEARS

## Data to improve retail food safety

### Restaurant characteristics (environmental antecedents) linked with outbreak size



Restaurants with a policy requiring workers to tell their managers if they are sick have smaller (fewer cases) norovirus outbreaks than restaurants without this policy



Restaurants in which gloves are used have smaller norovirus outbreaks than restaurants in which gloves are not used



Restaurants with only prep and cook serve food prep processes have smaller norovirus outbreaks than restaurants with complex food prep processes



# Long-term benefits of NEARS

## Data to improve foodborne outbreak response

### Gaps in investigation practices

- In 20% of outbreaks, the environmental assessment occurred 5 days after the outbreak was identified
- In 4% of outbreaks, the environmental assessment occurred between 6-27 days after outbreak identification

### Investigation practices and outbreak characteristics linked with contributing factor identification

- Contributing factors more likely to be identified when
  - An agent had been identified
  - Environmental assessment occurred soon after outbreak identification
  - Multiple establishment visits were made to complete the environmental assessment
  - Outbreak establishment prepared all meals on location
  - Outbreak establishment served more meals a day

# Summary

Support of environmental assessments at the state and local level (Training)

Collection and analysis of environmental assessment data at the national level (NEARS)

Improved identification of environmental factors contributing to foodborne illness outbreaks

Improved prevention and intervention

Improved food safety; fewer outbreaks

# Thank you

**vradke@cdc.gov**

For more information, contact NCEH  
1-800-CDC-INFO (232-4636)  
TTY: 1-888-232-6348      [www.cdc.gov](http://www.cdc.gov)  
Follow us on Twitter   [@CDCEnvironment](https://twitter.com/CDCEnvironment)

The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.





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# **New York State National Environmental Assessment Reporting System (NEARS) Perspective**

**Food Safety Summit  
May 8-10, 2017  
Rosemont Illinois**

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Environmental Health Specialist Network Coordinator  
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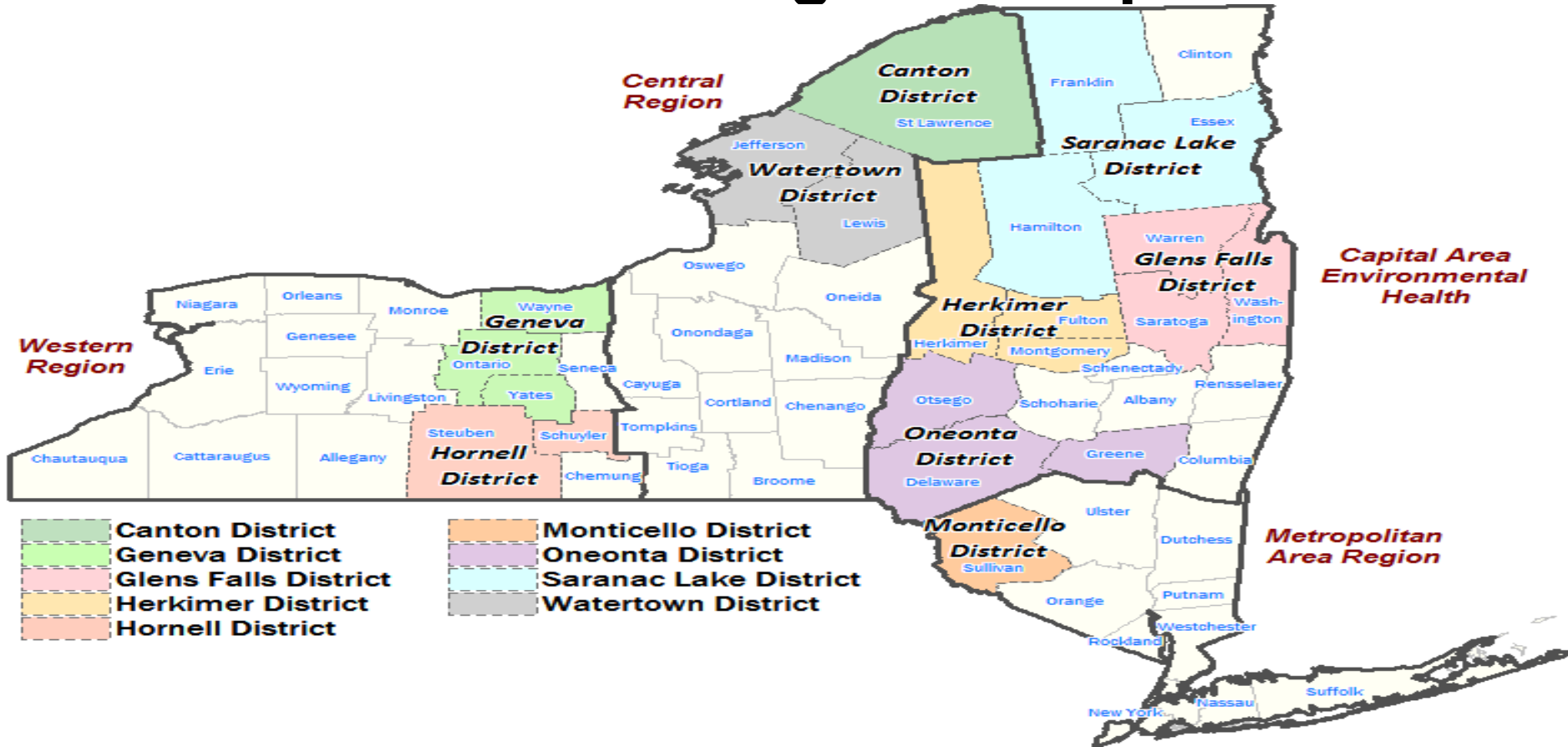
# OVERVIEW

- ❑ **Background**
  - NYSDOH
  - EHS-Net in NYS
  - Foodborne Disease Outbreak Surveillance
- ❑ **Environmental Assessments: A systems approach to foodborne illness outbreak investigations**
  - Systems Theory
  - Contributing Factors
  - Environmental Antecedents
- ❑ **NEARS – Data Collection**
  - Information the data can provide

# NYSDOH– LHDs

- **Home Rule State**
- **Four Regional Offices**
- **Local Health Departments (LHDs)**
  - 36 Full Service Local Health Departments
  - 9 State District Offices (21 Counties)
  - New York City DOH (5 Counties)

# NYSDOH Regional Map



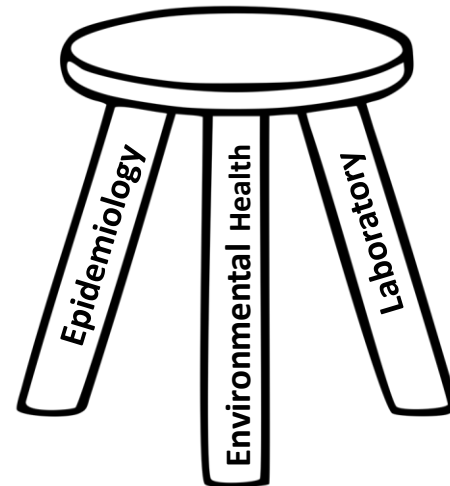
# EHS-NET IN NYS

- EHS-Net Site since 2001
- Participate, Coordinate and Conduct EHS-Net studies and NEARS
- Provide Training to LHDs on EHS-Net Studies and Investigating Outbreaks
- Coordinate Communication for all foodborne outbreaks amongst Local and State Environmental Health and Laboratory partners
- Maintain Foodborne Disease Surveillance for NYS
- Link Outbreak Data (NORS) with Environmental Assessment Data (NEARS)

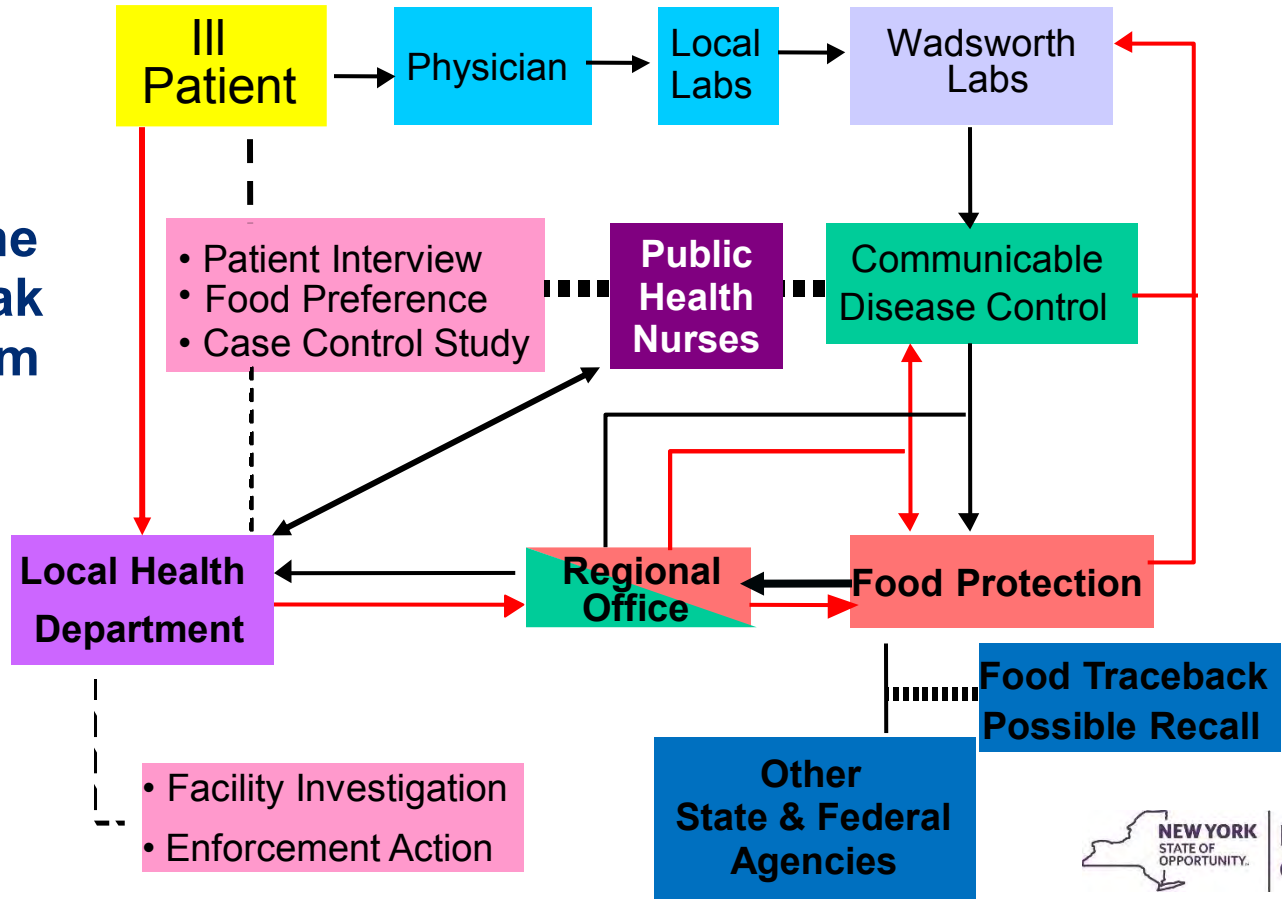


# THREE LEGGED STOOL

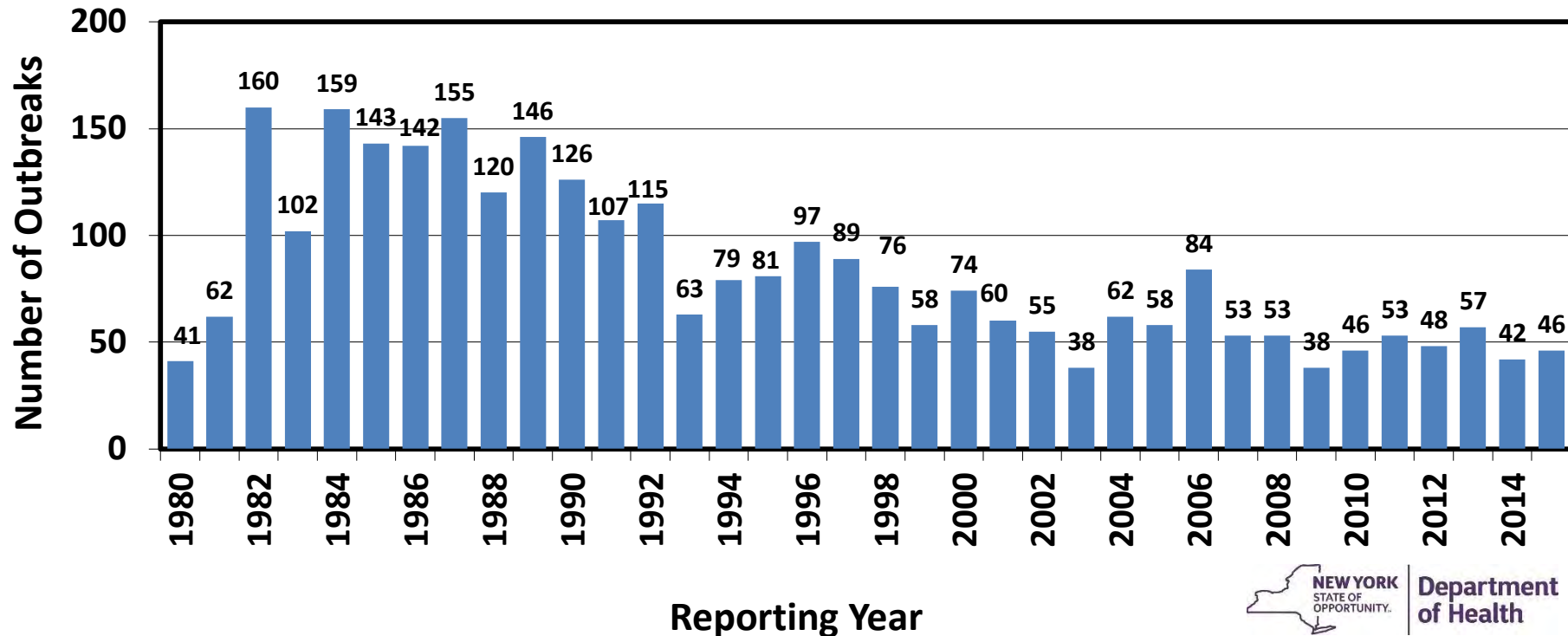
- **Environmental Health**
  - Visit and conduct evaluation at site
  - Review food prep procedures
  - Conduct staff interviews
  - Collect food & environmental samples
  - Interventions
- **Epidemiology**
  - Establish case definition
  - Design questionnaire and conduct ill & well interviews
  - Calculate food specific Attack Rate (AR)
  - Epi curves
  - Stool samples
- **Laboratory**
  - Sample analysis
  - PFGE matching
  - WGS



# NYS Foodborne Illness Outbreak Response Team

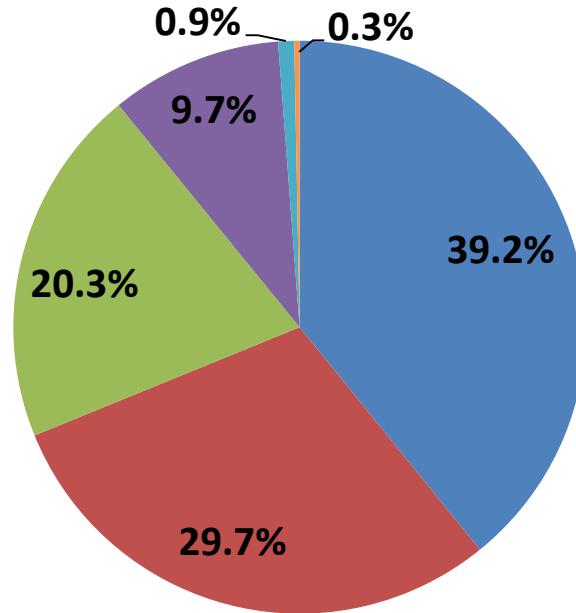


# Number of Foodborne Outbreaks, New York State 1980 – 2015



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# Number of Foodborne Outbreaks by Etiology in New York State, 2001-2015



## Number of outbreaks by etiology:

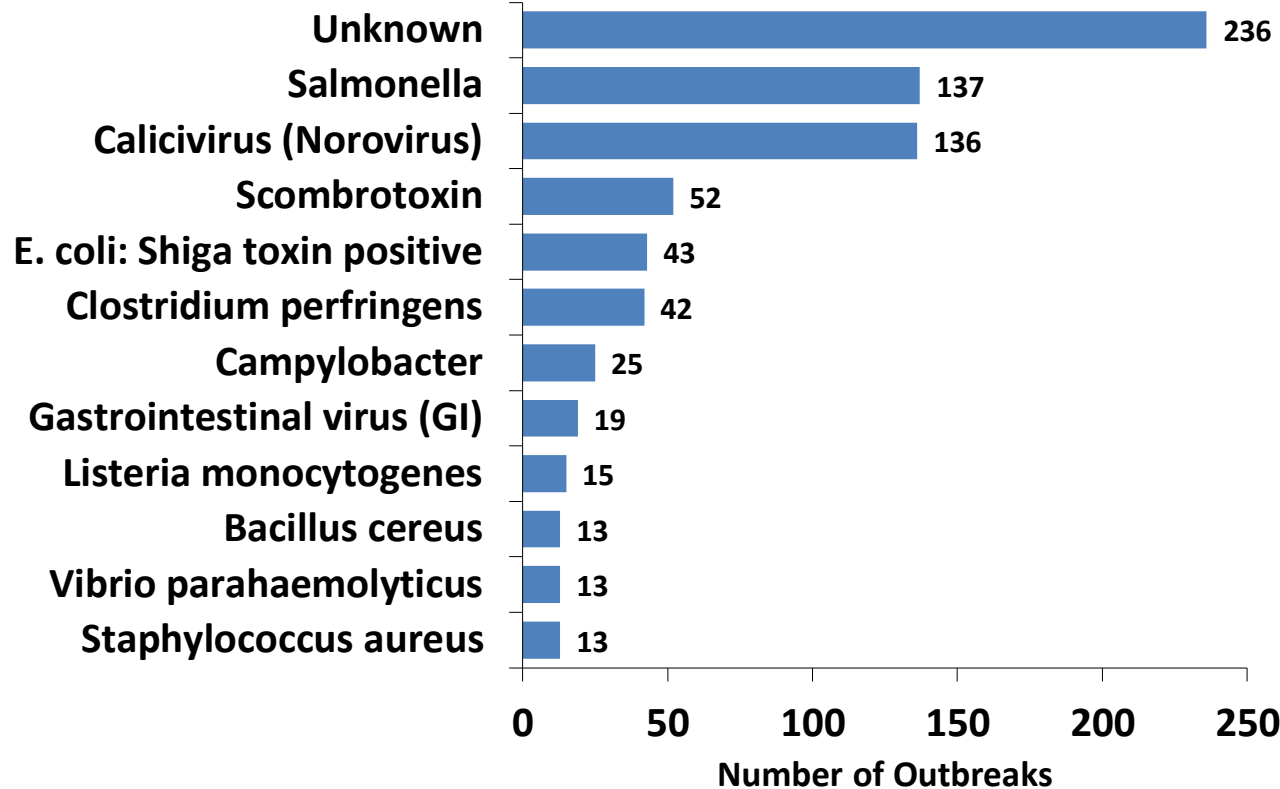
- Bacterial: 311
- Unknown: 236
- Viral: 161
- Chemical: 77
- Parasitic: 7
- Multiple: 2

Total Number of Outbreaks: 794

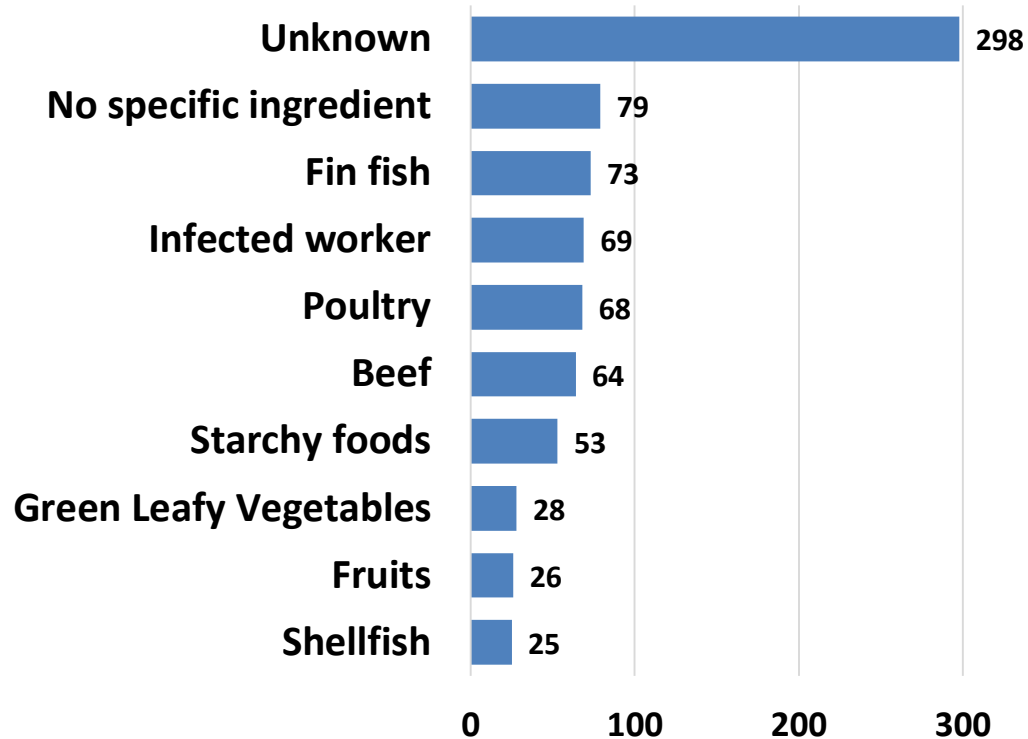


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# Top 10 Foodborne Outbreaks by Agent, New York State, 2001-2015

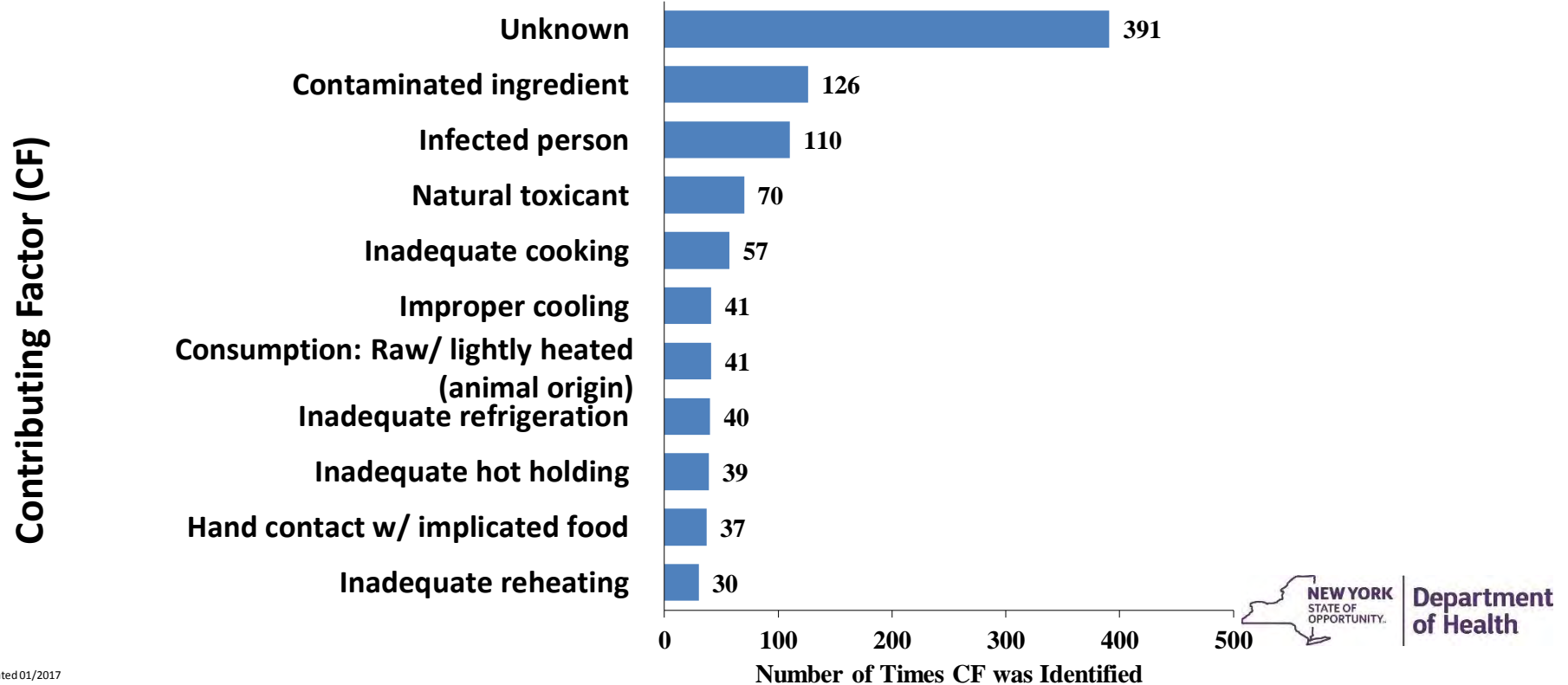


# Top 10 Significant Ingredient Identified in Foodborne Outbreaks, New York State 2001-2015

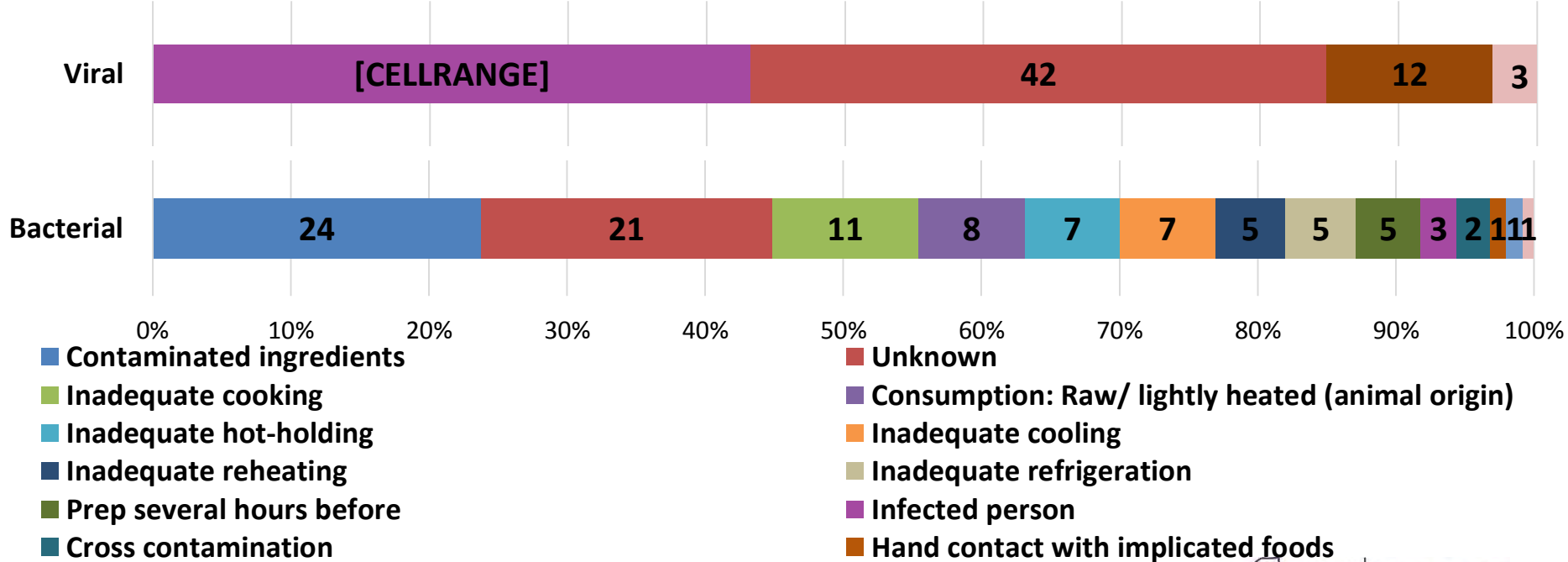


There were 884 instances where a significant ingredient was identified.

# Top 10 Contributing Factors Identified in Foodborne Outbreaks, New York State 2001-2015



# Distribution of Contributing Factors Identified in Bacterial and Viral Outbreaks, NYS, 2001-2015



183 Contributing Factors identified in 160 Viral Outbreaks  
 508 Contributing Factors identified in 311 Bacterial Outbreaks

\*Above numbers indicate percent (%)



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# WHAT REALLY CAUSED THE OUTBREAK?



# ENVIRONMENTAL ASSESSMENTS AS PART OF FOODBORNE ILLNESS OUTBREAK INVESTIGATIONS

## ❑ Environmental Assessment

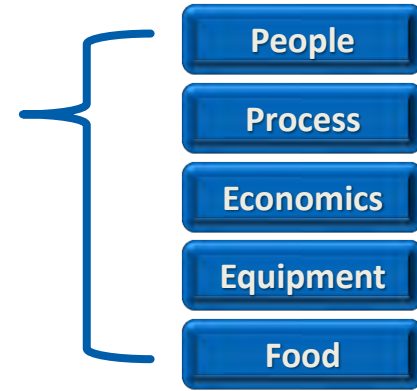
- Describes how the environment contributes to the introduction and/or transmission of agents that cause illness
  - **NOT A ROUTINE INSPECTION**

## ❑ Objectives of an environmental assessment

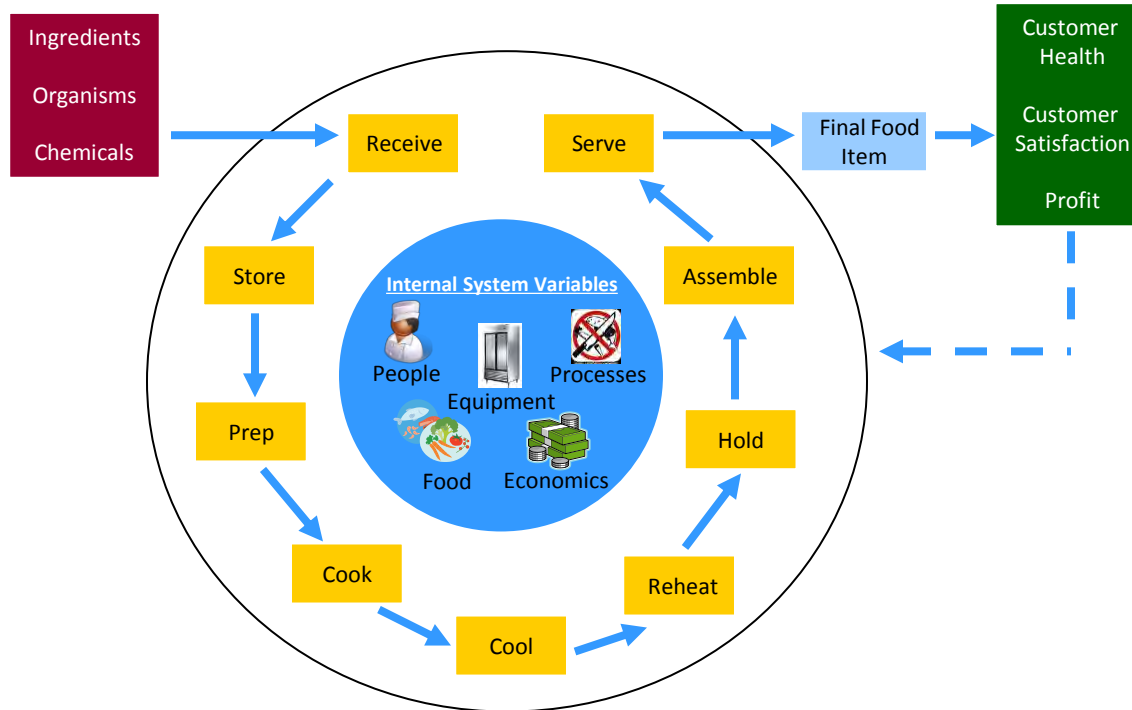
- Identify contributing factors
- Identify environmental antecedents
- Generate recommendations for informed interventions

# NATIONAL ENVIRONMENTAL ASSESSMENT REPORTING SYSTEM

- ❑ Captures environmental factors through environmental assessments
- ❑ Serves as a companion surveillance system to the National Outbreak Reporting System (NORS)

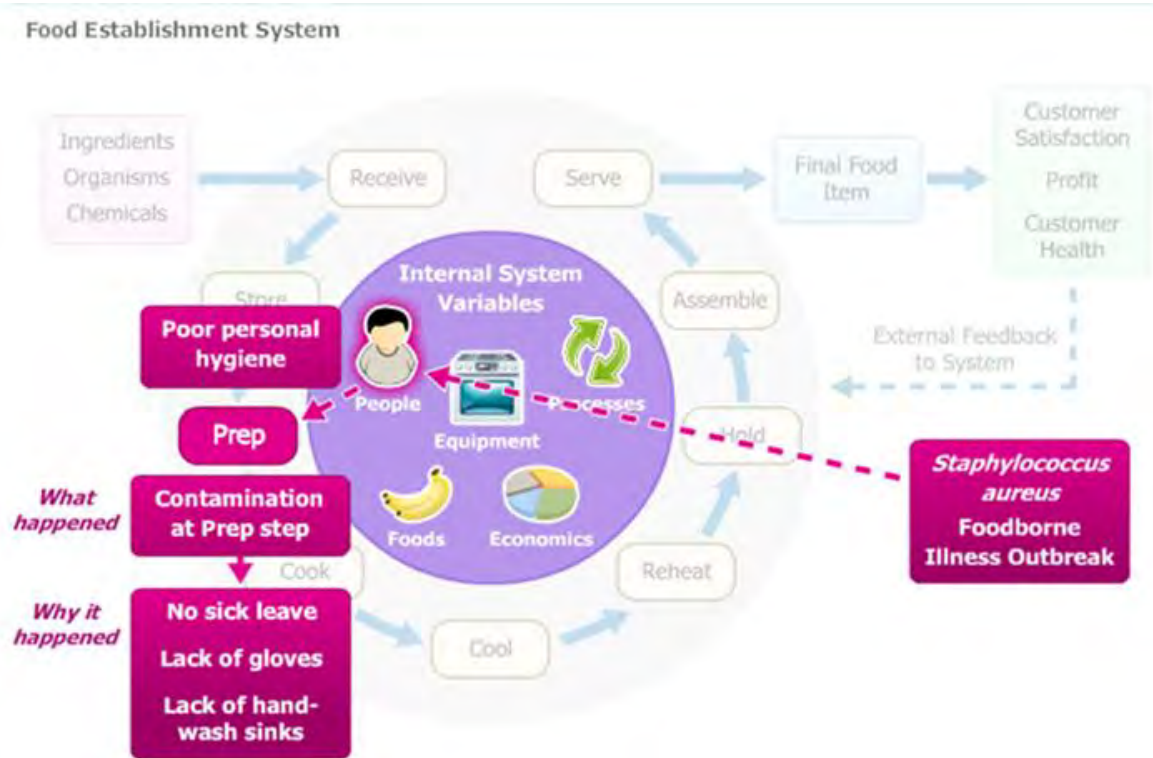


# THE FOOD ESTABLISHMENT SYSTEM



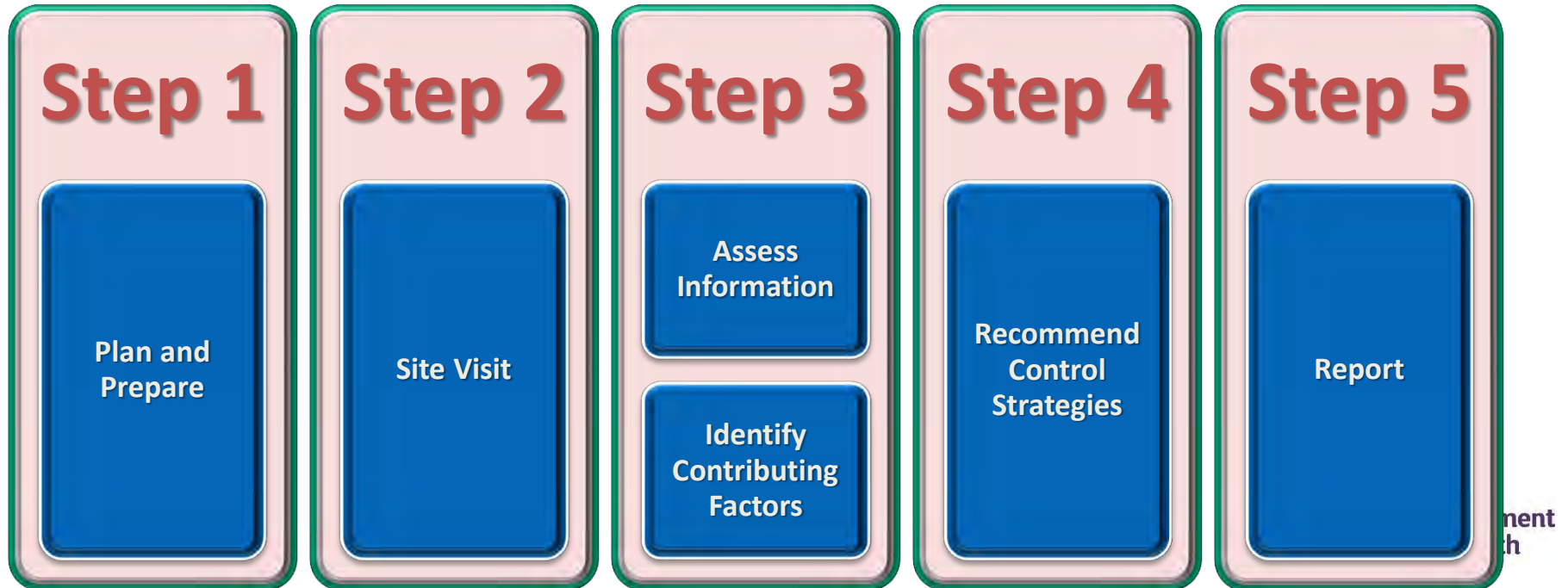
# EXAMPLE

- **Thorough understanding of the problem**
  - On the ground assessment by Environmental Health Specialist or Environmental Engineer
  
- **Identification of underlying causes of problems (not just symptoms)**
  - Contributing Factors
  - Environmental Antecedents



Source: CDC NCEH

# ENVIRONMENTAL ASSESSMENTS AS PART OF FOODBORNE ILLNESS OUTBREAK INVESTIGATIONS



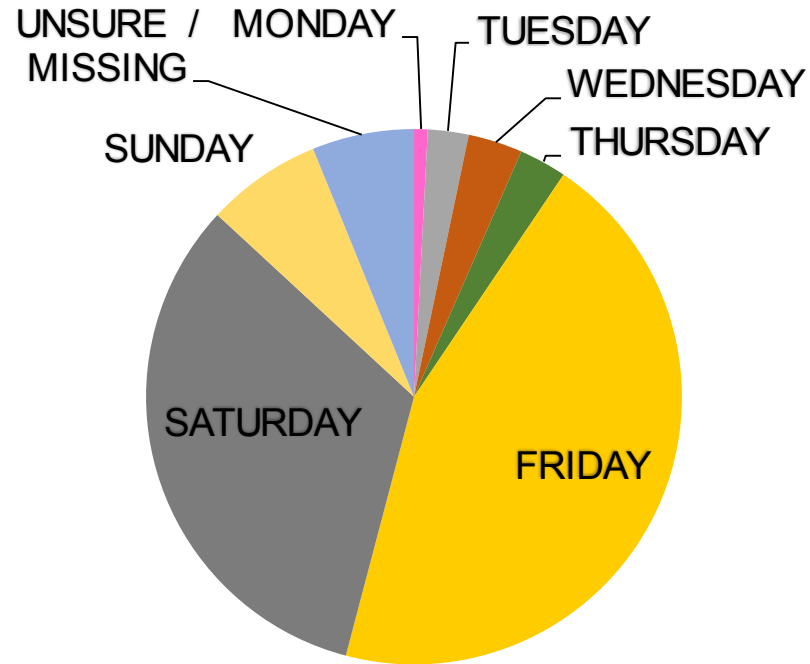
# ENVIRONMENTAL ASSESSMENTS IN NYS

- ❑ Incorporated in the Investigation of a FBDO
  
- ❑ Conducted by LHDs at Regulated Food Service Establishments
  - Submitted by LHDs to Central Office
  - Reviewed and feedback provided by Central Office
  - Data entered by Central Office
  
- ❑ EHS-Net Administrator = NORS Reporting Site Administrator
  - Allows for improved data quality and verification of data between NEARS and NORS

# INFORMATION NEARS DATA CAN PROVIDE



# PART III- BUSIEST DAY



2006-2008

# DISPOSABLE GLOVES

	Yes	No	Missing
Glove Policy*	193 (79.1)	48 (19.7)	3 (1.2)
Glove Supply**	198 (81.1)	41 (16.8)	5 (0.4)
Glove Use**	159 (65.2)	72 (29.5)	13 (5.3)



**2006-2008**

\*Part III  
\*\*Part IV

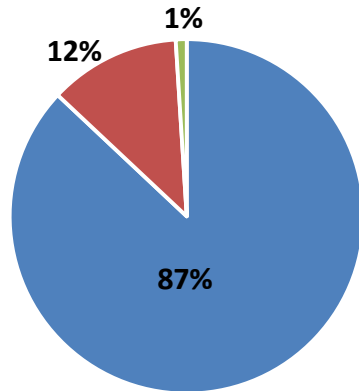


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# HAND HYGIENE CHARACTERISTICS

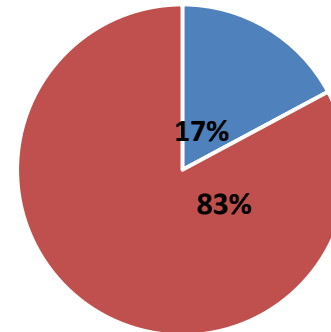
Does the establishment have a disposable glove use policy?

■ Yes    ■ No    ■ Missing data



Do food workers handle ready-to-eat foods with bare hands?

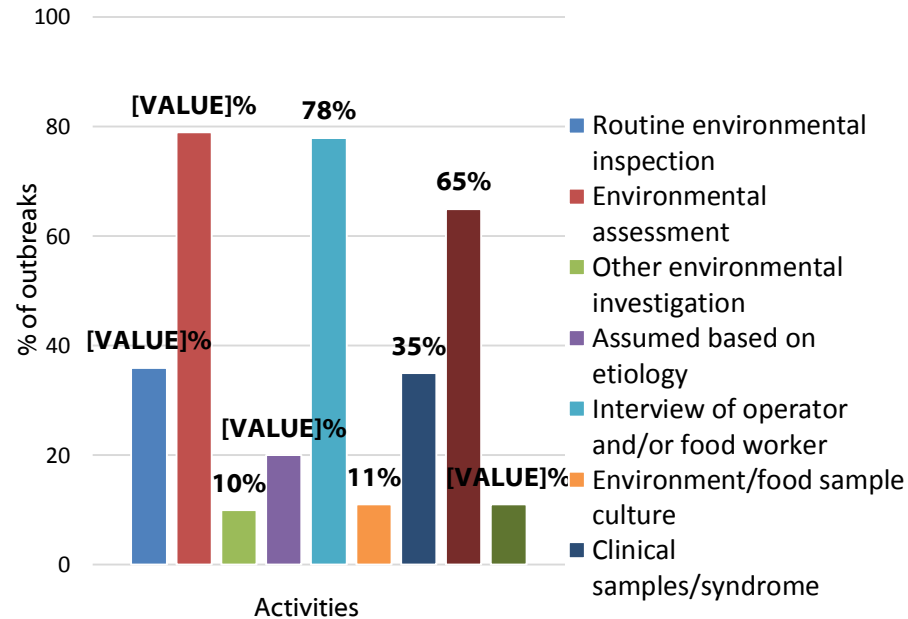
■ Yes    ■ No



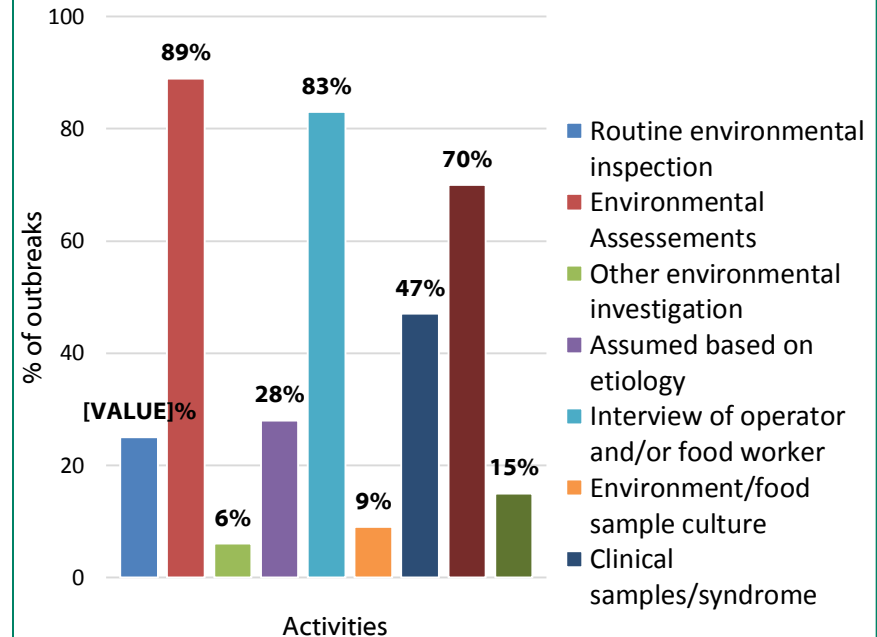
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# ACTIVITIES USED TO TRY TO IDENTIFY CONTRIBUTING FACTORS

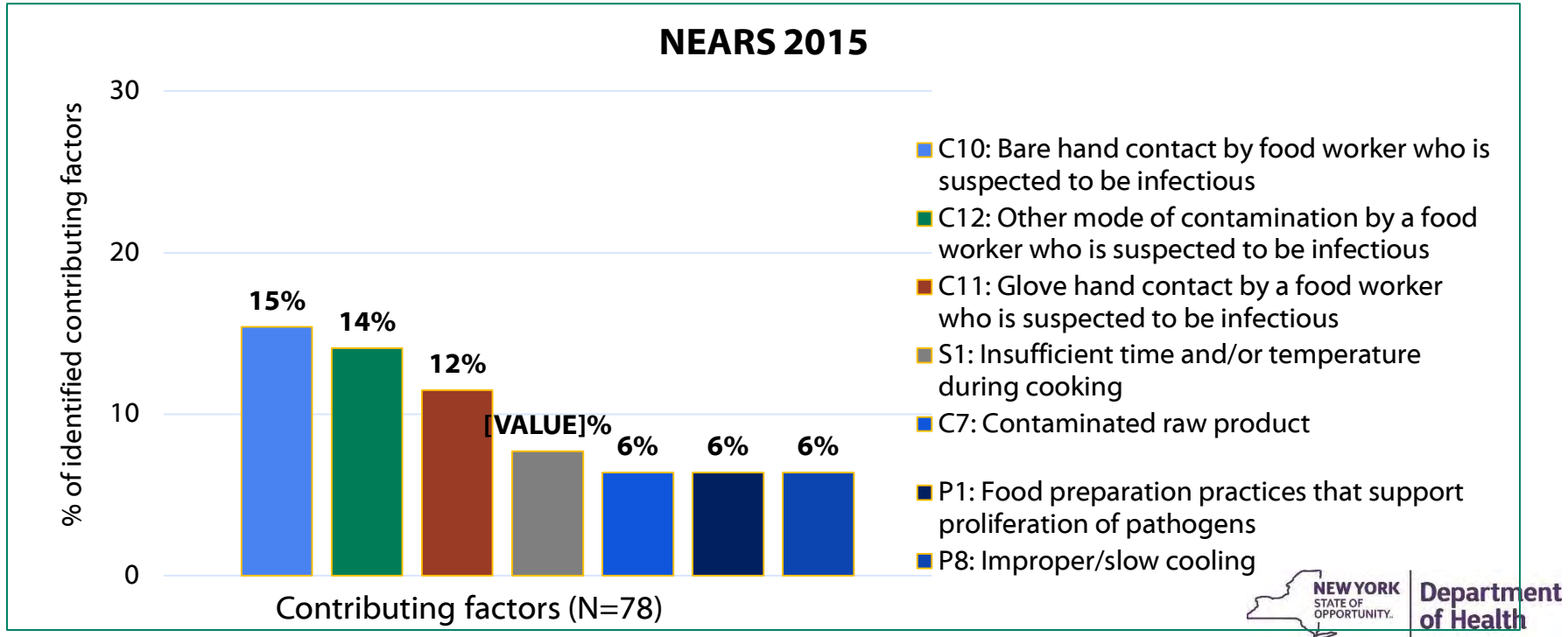
Activities used to try to identify contributing factors – NEARS 2014



Activities used to try to identify contributing factors – NEARS 2015



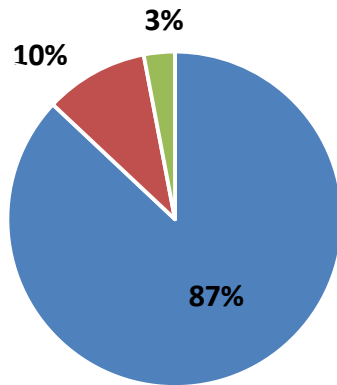
# MOST COMMONLY REPORTED CONTRIBUTING FACTORS



# ILL WORK CHARACTERISTICS

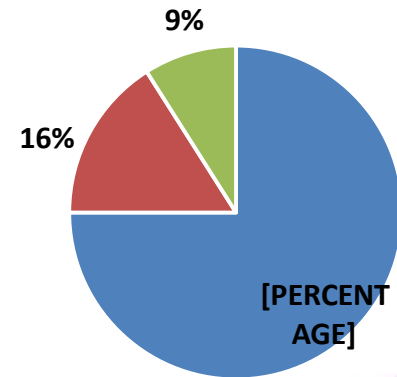
Does the establishment have a policy that requires food workers to tell a manager when they are ill?

■ Yes ■ No ■ Missing data



Does this policy require ill workers to tell managers what their symptoms are?

■ Yes ■ No ■ Missing data



# NYS 2016 PRELIMINARY DATA

## ☐ Reviewed 5 Norovirus Outbreaks

- 5/5 Infected Food Handler Primary CF
- 4/5 Had a Certified Kitchen Manager
- 4/5 Exposure Date was on Busiest Day
- 5/5 Had a Glove Policy, **1/5 Written Glove Policy**
  - 5/5 Glove Supply Observed, **3/5 Used Gloves Properly**
- 5/5 Ill Worker Policy , **2/5 Written Ill Worker Policy**
  - **2/5 Required Ill Worker to Report Illness to Manager**
  - **2/5 Specified Sx Worker was to Report to Manager**
  - **1/5 Offered Paid Sick Leave**



# WHAT ELSE



- ❑ Manager Interview
  - Food Worker
    - Number of workers
    - Food safety training and certification
    - Language
  - Policy
    - Cleaning
    - Glove use
    - Health policies





# WHAT ELSE



- Observations
  - Physical Facilities
  - Food Handling Practices/ Food preparation
  - Storage
  - Food worker behavior
- Food Vehicle
- Contributing Factors
- Etiology

# ACKNOWLEDGEMENTS

- ❑ **Centers for Disease Control and Prevention**
  - Erik Coleman
  - Adam Kramer
  - Vince Radke
  - Laura Brown
  
- ❑ **EHS-Net Site Partners**
  
- ❑ **Local Health Departments**

# THANK YOU! QUESTIONS



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**Session 11**  
**The Importance of the Environmental Component of Foodborne Illness  
Outbreak Investigations**

**In-Factory Investigations and Risk Assessments: The Two Foot level**

**Jeffrey L. Kornacki, Ph.D.**  
**President and Senior Technical Director**

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**608-230-6301**

**Food Safety Summit**  
**Donald Stephens Convention Center**  
**Rosemont, IL**

**May 10, 2017**



# Why Are We Here?

Galaxies NGC 2207 and IC 2163



Hubble  
Heritage



## Why Do We Care About Food Safety?

- **Illness / death**


**48 million cases, 128,000 hospitalizations,  
3000 deaths per year<sup>1,2,3</sup>**

- **Recalls-public exposure & lost market share**
- **Lawsuits -stricken individuals / class action**
- **Lawsuits-shortened customers**

[1www.cdc.gov/foodborneburden](http://www.cdc.gov/foodborneburden) December 2010


<sup>2</sup>Scallan, E., R.M. Hoekstra, F.J. Angulo, R.V. Tauxe, M-A. Widdowson, S.L. Roy, et al. 2011. Foodborne illness acquired in the United States—major pathogens. Emerg Infect Dis. 2011 Jan; [Epub ahead of print]

<sup>3</sup>Scallan, E., R.M. Hoekstra, F.J. Angulo, R.V. Tauxe, M-A. Widdowson, S.L. Roy, et al. 2011. Foodborne illness acquired in the United States—major pathogens. Emerg Infect Dis. 2011 Jan; [Epub ahead of print]





# **Microbiological Risks - Food Safety *(continued)***

- **Down time until contamination sites determined and eliminated and food safety system overhauled**
  - **Costs of repairs / modifications**
  - **Costs to remanufacture product**
  - **Insurance issues**
- 



**Principal Source of  
Microbial Contamination  
in Processed Foods:**

***Processing Environment***


***Often related to unhygienic  
equipment design***







# Approaches to Food Contamination Investigation

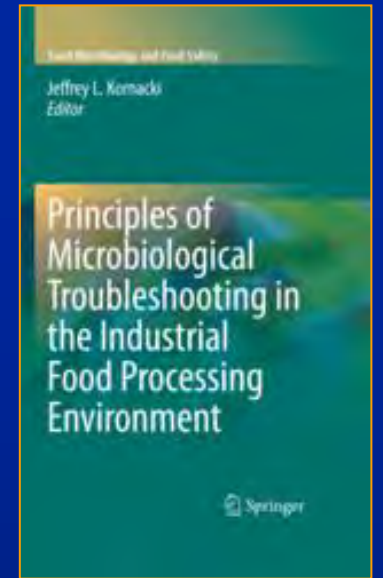
- **Initial review of factory concerns and data**
  - **Review of Food Safety/HACCP plans (including validation)**
    - Review of process on paper
    - Question the CCP's and CL's – based upon solid science or tradition or “logic”
  - **Review of factory generated data**
    - (pre-operational, post-operational, in-line and finished product sample test results, etc.)
  - **“Scoping the Problem”**
- 

## Food Contamination Investigation – Approaches (Cont.)

- **Walk-through**, understand the process, pre-selection of sampling sites (“Risk Assessment-walk through”)
- **Taking samples** (often expanded; Op, Post-Op, Pre-op)
- **Evaluation of investigator generated data**
- **Further sampling** if necessary
- **Re-validation of CCPs/Preventive Control** (if corrective actions fail or if CCP’s not certain to destroy pathogens)

# Importance of GMPs, HACCP, Finished Product Testing

- None by themselves get us to microbiological food safety (Kornacki, 2009)
- Tomatoes (HACCP Verification)
- Testing statistics



## Test Number Needed to Detect One or More Positives per Lot

Percent positives % Positive	Number of analytical units to be tested (n)		
	90 % confidence	95 % confidence	99 % confidence
100	3	4	4
10	23	30	46
1	230	299	461
0.1	2,303	2,996	4,605
0.01	23,026	29,963	46,052

Adapted: Compendium of Methods for the Microbiological Examination of Foods 3<sup>rd</sup> ed.

Kornacki, J.L. 2009. The missing element in microbiological food safety inspection approaches, Part 1. February-March, Food Safety Magazine, Glendale, CA.


Kornacki, J.L. 2009. The missing element in microbiological food safety inspection approaches, Part 2. April-May, Food Safety Magazine, Glendale, CA.

# Examples of Outbreaks Attributed to Environmental Contamination


Product	Pathogen	Comment	Reference
<i>Ice Cream</i>	<i>S. Enteritidis</i>	Pasteurized ice cream mix in tanker truck previously used for transporting raw liquid eggs	Hennessy <i>et al.</i> (1996)
Infant formulae	<i>S. Eealing</i>	Contamination from the processing environment, insulation material of the drying tower	Rowe <i>et al.</i> (1987)
<b>Soft cheese</b>	<i>S. Berta</i>	Cheese ripening in buckets previously used for chicken carcasses	Ellis <i>et al.</i> (1998)
Cooked sliced ham	<i>S. Typhimurium</i>	Cooked ham placed into containers previously used for curing raw pork	Llewellyn <i>et al.</i> (1998)
Chocolate	<i>S. Napoli</i>	Possibly contaminated water used in double-walled pipes, tanks,	Gill <i>et al.</i> (1983)
<b>Chocolate</b>	<i>S. Eastbourne</i>	Contamination from the processing environment	Craven <i>et al.</i> (1975)
<i>Butter</i>	<i>S. Eastbourne</i>	Contamination from the processing environment	Lyytikainen <i>et al.</i> (2000)
Hot dogs	<i>L. monocytogenes</i>	Contamination from the processing environment	Anonymous (1999)
Canned salmon	<i>C. botulinum</i>	Contamination from the processing environment, cooling water	Anonymous (1984); Stersky <i>et al.</i> (1980)
Lasagna	<i>S. aureus</i>	Growth of <i>S. aureus</i> in the processing equipment, improper cleaning	Woolaway <i>et al.</i> (1986); Aureli <i>et al.</i> (1987)

## Examples of Outbreaks Attributed to Environmental Contamination *continued*

Product	Pathogen	Comment	Reference
Different foods	<i>E. coli</i> O157:H7	Contaminated meat grinder and equipment at retail level	Banatvala <i>et al.</i> (1996)
<i>Chocolate milk</i>	<i>Y. enterocolitica</i>	Probably during manual mixing of pasteurization milk and chocolate or contaminated chocolate syrup	Black <i>et al.</i> (1978)
Canned meat	<i>S. Typhi</i>	Use of non-potable water for can cooling	Ash <i>et al.</i> (1964); Stersky <i>et al.</i> (1980)
Crabmeat	<i>S. aureus</i>	Contamination during manual picking of cooked meat	Bryan (1980)
Canned mushrooms	<i>S. aureus</i>	Possible growth of <i>S. aureus</i> in the brine bath before canning	Hardt-English <i>et al.</i> (1990)
Flavored Yogurt	<i>E. Coli</i> O157:H7	Pump previously used for raw milk	Morgan <i>et al.</i> (1993)
Pastry	<i>S. Enteritidis</i> PT4	Equipment previously used for raw eggs or insufficiently cleaned piping and nozzles used for cream	Evans <i>et al.</i> (1996)
Yeasts	<i>S. München</i>	Contamination from the processing environment	Joseph <i>et al.</i> (1991)
<i>Pasteurized milk</i>	<i>S. Typhimurium</i>	Possibly cross-connection between raw and pasteurized milk	Lecos (1986)
<i>Pasteurized milk</i>	<i>E. coli</i> O157:H7	Contamination from pipes and rubber seals of the bottling	Upton & Coia (1994)
<i>Mexican type cheese</i>	<i>L. monocytogenes</i>	Contamination from the processing environment	Linnan <i>et al.</i> (1988)



Environmental contamination  
increases the risk of  
post-process contamination, *if  
the product is not biocidally  
treated in the end-use container*





# Environmental Contamination


“... *cross contamination* ...was mentioned as the *most important factor* relating to the presence of pathogens in prepared foods”<sup>1</sup>

*Environmental contamination is the principle source of contamination of processed foods*

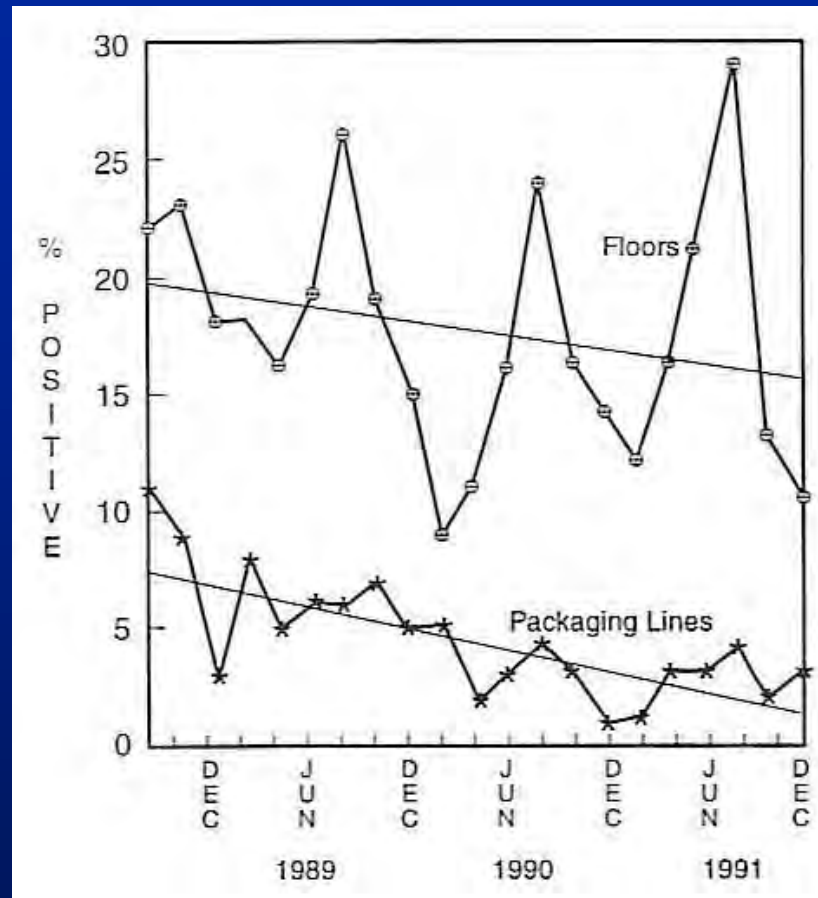
*It is from the **post-processing (post-CCPm)** environment<sup>2</sup>*

<sup>1</sup>Riej, et al. 2005. *Recontamination as a source of pathogens in processed foods-A literature review*. ILSI. Quoting, Rocourt, J., et al. 2003. Present state of foodborne disease in OECD countries. WHO, Food Safety Department, Geneva.

<sup>2</sup>Kornacki, J. L. 2009. The missing element in microbiological food safety inspection approaches, Part I. Food Safety Magazine. February / March.



# Correlation of % *Listeria* spp. Isolated from Packaging Lines and Floors to RTE Meat



Lead to in-plant risk assessment concept

Tompkin, R.B., L.N. Christiansen, A.B. Shaparis, R.L. Baker, and J.M. Schroeder. 1992. Control of *Listeria monocytogenes* in processed meats. Food Australia 44:370-376

Kornacki, J. L. and J. B. Gurtler. 2007. Incidence and control of *Listeria* in food processing facilities, Chapter 17. In, E. T. Ryser and E. H. Marth (eds.), *Listeria, listeriosis and food safety*, 3<sup>rd</sup> ed. CRC Press, Taylor & Francis Group, Boca Raton, FL. Pp. 681-766.(see page 729).






# Correlations of % Environmental to % Finished Product Contamination

Smoked fish plant: Correlation of environmental *L. monocytogenes* to finished product ( $p < 0.0001$ )

Thimothe et al. 2004. Tracking of *Listeria monocytogenes* in smoked fish processing plants. J. Food Prot. 67(2):328-341.






# Variables Affecting Likely Contamination From the Processing Environment

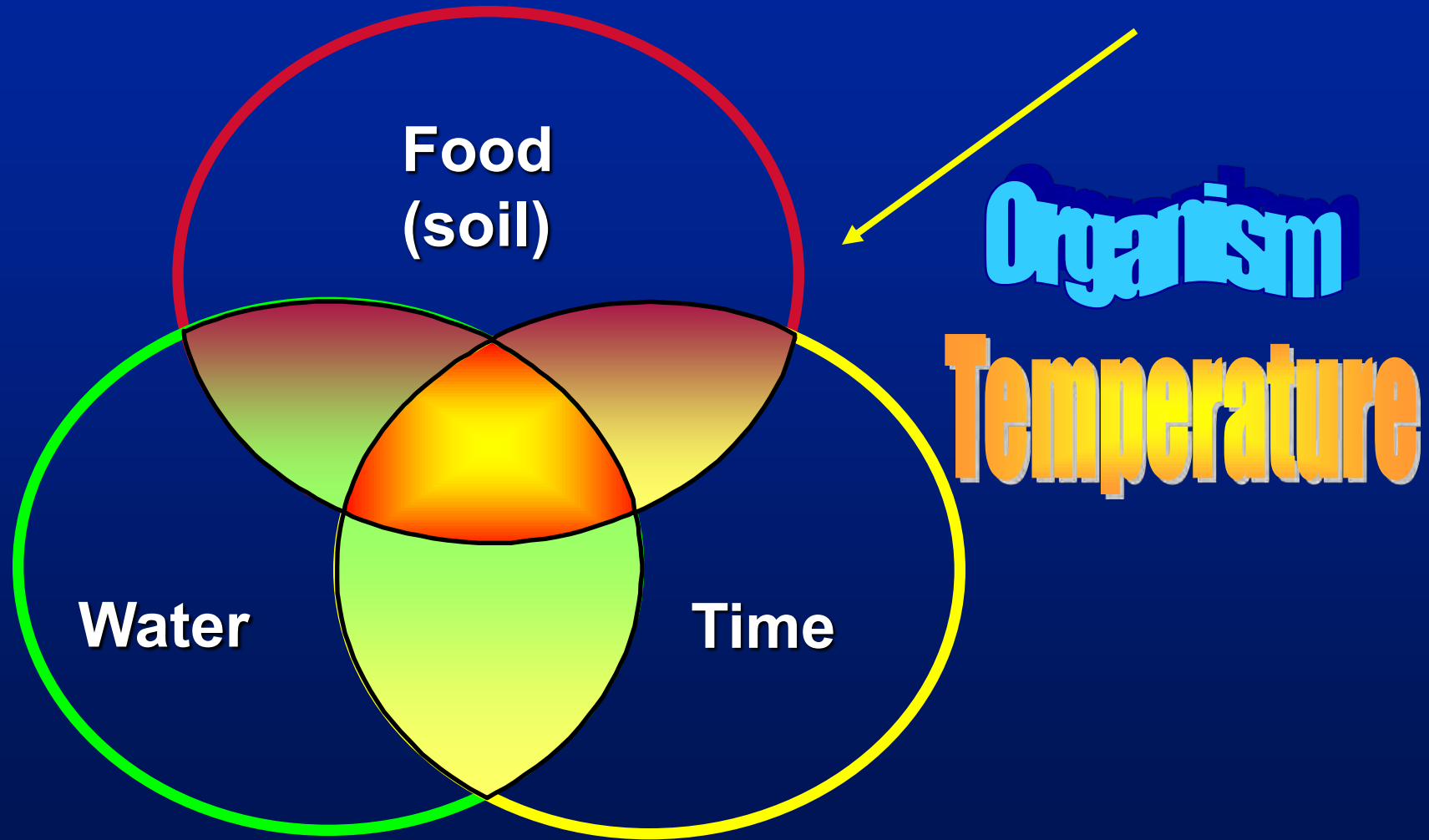
“The probability of product contamination from the environment is dependent upon a number of variables...”

1. *Proximity of microbial growth niches to the product stream*
2. *Number of niches in the factory*
3. *Spatial relationships of niches and product stream*
4. *Microbial population in niches*
5. *Degree of niche disruption during operations*
6. *Exposure of the product stream to the environment*

Gabis, D. A. and R. E. Faust. 1988. Controlling microbial growth in the food-processing environment. Food Technol. Dec. pp. 81-82.; 89.




# Microbial Growth Requirements






# Microbial Growth Niches

- **Operating practices (e.g. sanitation)**
  - **Maintenance / repair practices**
  - **Design / fabrication of factory / equipment**
- 



## Site Specific Risk: High, Medium and Indirect Risks

- ***High risk*** - an area or practice which may directly contaminate the product
  - ***Medium risk*** - similar to “high risk”, but mitigating factors (such as further heat processing) ***may*** reduce risk by an undetermined amount
  - ***Indirect risk*** - any situation or condition (such as standing water) which potentially may contaminate product under certain but not defined conditions
- 

# An Example of Site Specific Risk Assessment Frame Work (Salad Dressing)

	Suggested			
Risk	Priority	Site	Comments/Observations/ Data	Recommendations

## Unsanitary Maintenance/Repair Practices

ILL fitting / protruding gasket at bottom of mix tank



Unchanged gasket at bottom of mix tank



A chance to drill into the specifics

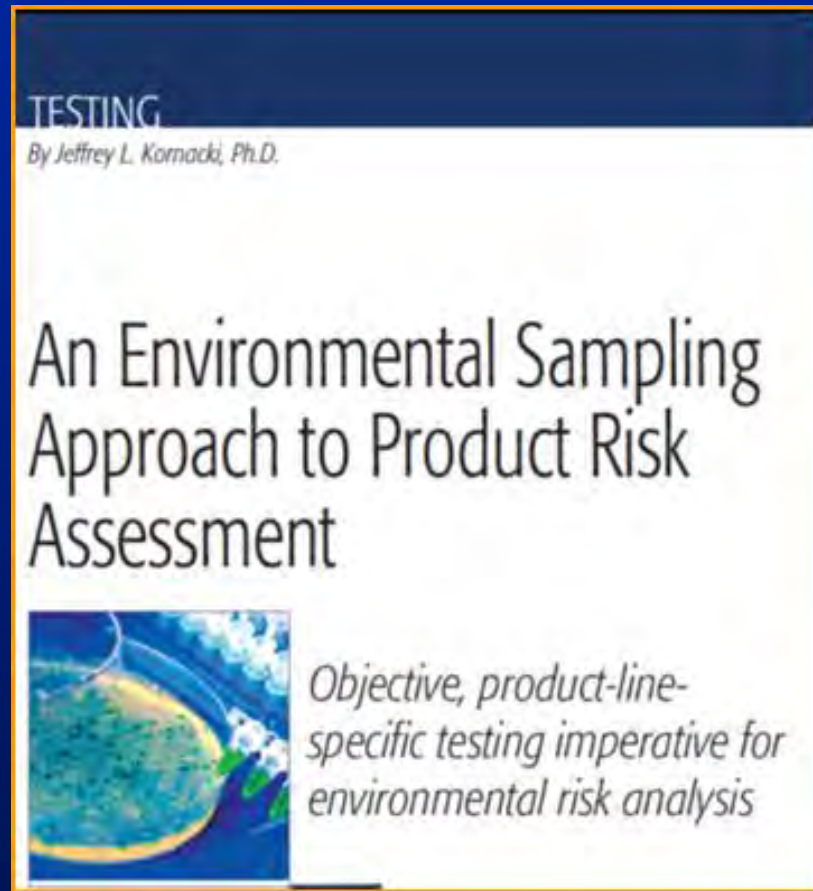


# Parking Tickets Vs. Parking Permits

Direct vs indirect approaches



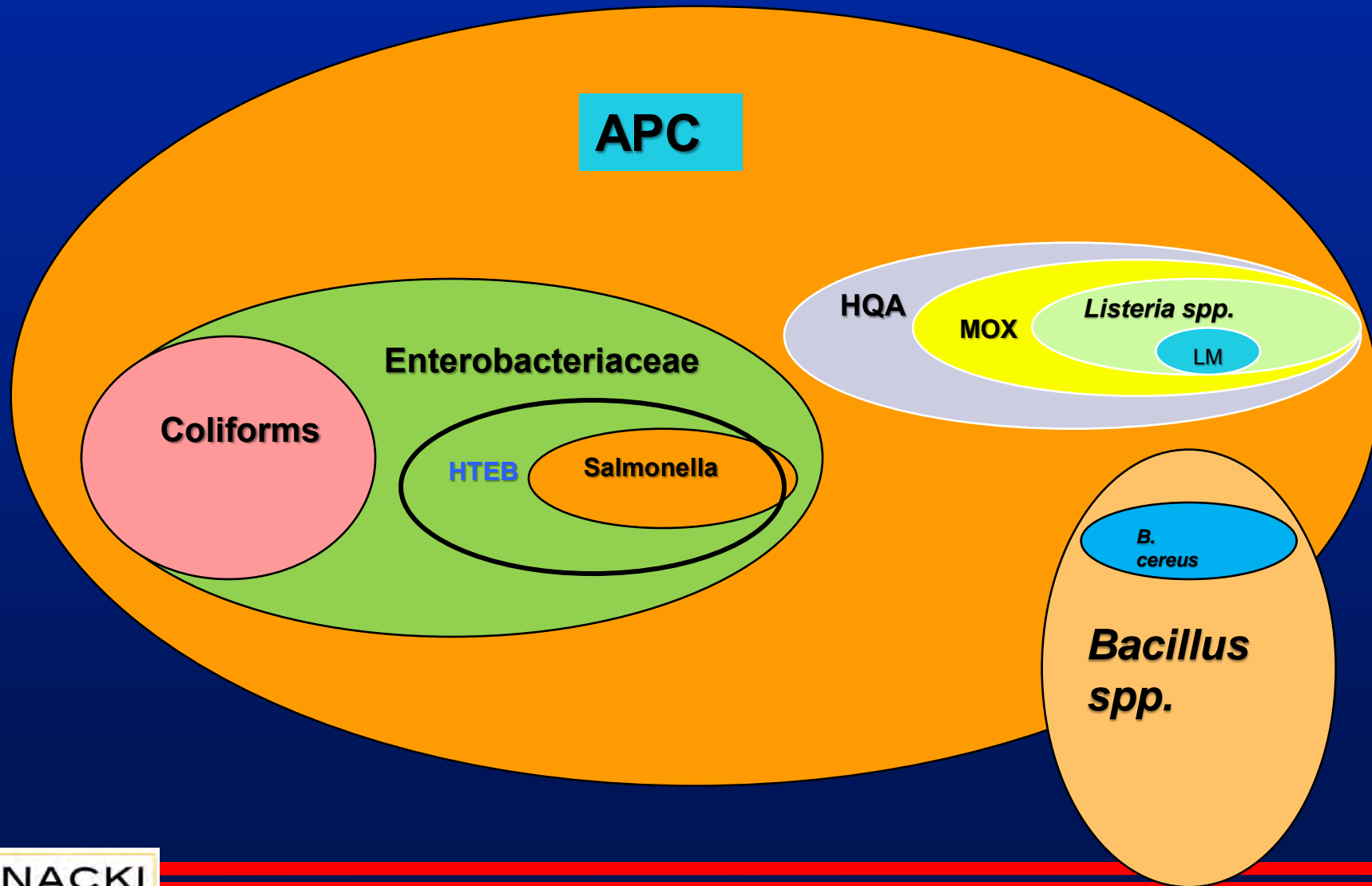
# Line Specific Risk Assessment -Use of Indicators: An Industrial Approach



Kornacki, J. L. 2014. An environmental sampling approach to product risk assessment. February/March issue.



# Relationship of Selected Microbiological Tests/Organisms



***In-Line*** product testing at key points

Assess risk, build up, potential for growth, etc. *Hygienic Indicators,  $a_w$ , pH*

***Environmental*** testing

**Zone 1-2:** *Hygienic indicator microbiological assays*

**Zone 3-4:** *Indicators and selected pathogens*



# Generalized Risk Assessment Matrix

In-light of recent experiences this should  $\leq 1\%$  wrt to *Listeria* spp.

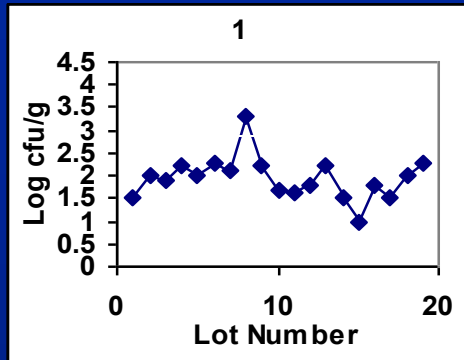
Case No.	Environmental	Environmental	Product-Associated Zone	In-Line Testing	Risk Ranking
	Zones 3-4, <i>Salmonella</i> or 5% <i>Listeria</i> spp.	Zones 3-4, 5% HTEB or 5% EB, APC or coliforms with 100,000 or more per ft <sup>2</sup>	Zones 1-2 product proximity-associated, any <i>Listeria</i> spp., MOX- or HQA-positive or any EB or coliforms (100 if dry cleaned) or APC >1,000	In-line or product (EB >100 per gram if a dry product)	
1	Positive	Positive	Positive	Positive	4.0
2	Positive	Positive	Positive	Negative	4.0
3	Positive	Positive	Negative	Positive	4.0
4	Positive	Positive	Negative	Negative	2.5
5	Positive	Negative	Positive	Positive	4.0
6	Positive	Negative	Positive	Negative	4.0
7	Positive	Negative	Negative	Positive	4.0
8	Positive	Negative	Negative	Negative	2.5
9	Negative	Positive	Positive	Positive	3.5
10	Negative	Positive	Positive	Negative	3.5
11	Negative	Positive	Negative	Positive	3.0
12	Negative	Positive	Negative	Negative	2.0
13	Negative	Negative	Positive	Positive	2.5
14	Negative	Negative	Positive	Negative	2.5
15	Negative	Negative	Negative	Positive	2.0
16	Negative	Negative	Negative	Negative	2.0

HTEB, hydrogen-sulfide-producing thermophilic Enterobacteriaceae; EB, Enterobacteriaceae; APC, aerobic plate count; MOX, modified Oxford agar; HQA, hygienic quality assay.

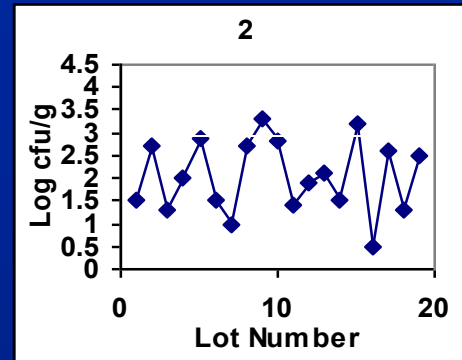
Kornacki, J. L. 2014. An environmental sampling approach to product risk assessment. Food Safety Magazine. February/March issue.

# Hypothetical examples of using data from an assay for a microbiological Indicator to verify the effectiveness of a food safety system

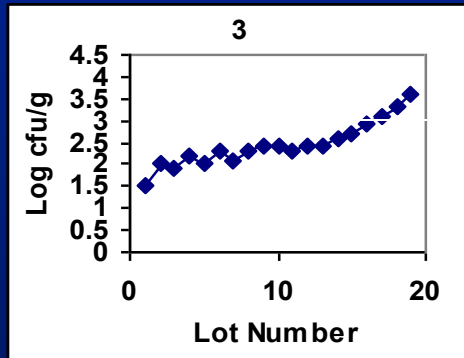
1. System under control



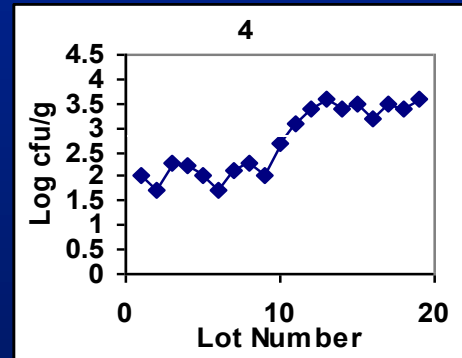
2. Lack of control due to excess variability



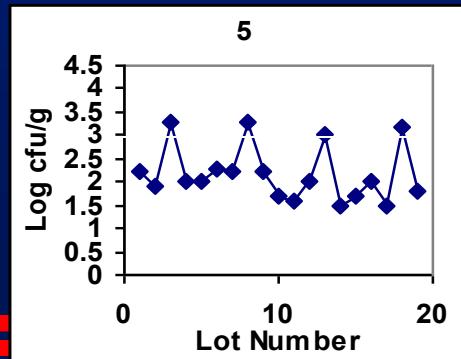
3. Loss of control due to gradual process failures



4. Loss of control due to abrupt process failures



5. Loss of control due to a reoccurring, transitory failure



# Putting It Together: What Is Needed

- **GMP audits and controls** (including sanitation preventive controls)
- **HACCP verification** (process preventive controls)
- **Appropriate product testing** (Verification)
- **All other preventive controls** (supply chain and allergen preventive controls)
- **And Approaches to monitoring, assessment and controlling *the environment*** (sanitation verification)




# Summary

- GMP audits, HACCP verification audits, and finished product hold and test programs are not enough by themselves to assure food safety
- **The processing environment is a significant source of contamination to processed products**



# Summary (continued)

- Companies neglect monitoring and control of the processing environment to their own harm and to that of the public.
  - There are new tools that can be used to control risk (e.g. HQA, HTEB; risk assessment matrix)
  - Be aware of false paradigms in your investigations and sampling of the processing environment
  - Tracking and trending is important, as is some finished product testing
- 

# Summary (Continued)

- **Diligence and vigilance are essential!**

