

Welcome to the  
North Central Regional Meeting  
of the

# Kansas Food Safety Task Force

Salina, Kansas

February 21, 2018



# Food Protection Task Force: oVerview, Vision, and Volunteers



Adam Inman, Assistant Program Manager  
Kansas Department of Agriculture

# Overview

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- Concept
- Other States' FPTFs
- Ideas for Kansas' FPTFs
- Call for Volunteers

# FPTF Concept

- Link regulatory, industry, academia, and consumer groups
- Enhance outreach, response, integration, and information sharing
- Increase awareness of potential food supply vulnerabilities
- Create foodborne illness prevention programs
- Improve foodborne illness surveillance systems
- Improve outbreak response

# Other States' Work

- [www.foodprotectiontaskforce.com/](http://www.foodprotectiontaskforce.com/)

**THE FOOD PROTECTION TASKFORCE**

Select Site  
Visit

HOME STATES BLOG FOOD SAFETY WORLD FDA SOCIAL MEDIA ABOUT CONTACT

The Food Protection Taskforces convene a state's stakeholders in food safety: Federal, state and local government, academia, industry and consumer groups. See the [Contact](#) page to get in touch with someone regarding the Taskforce grant.

### Welcome

Welcome to the homepage of the Food Protection Taskforce grantee network. This site highlights...

### Latest News

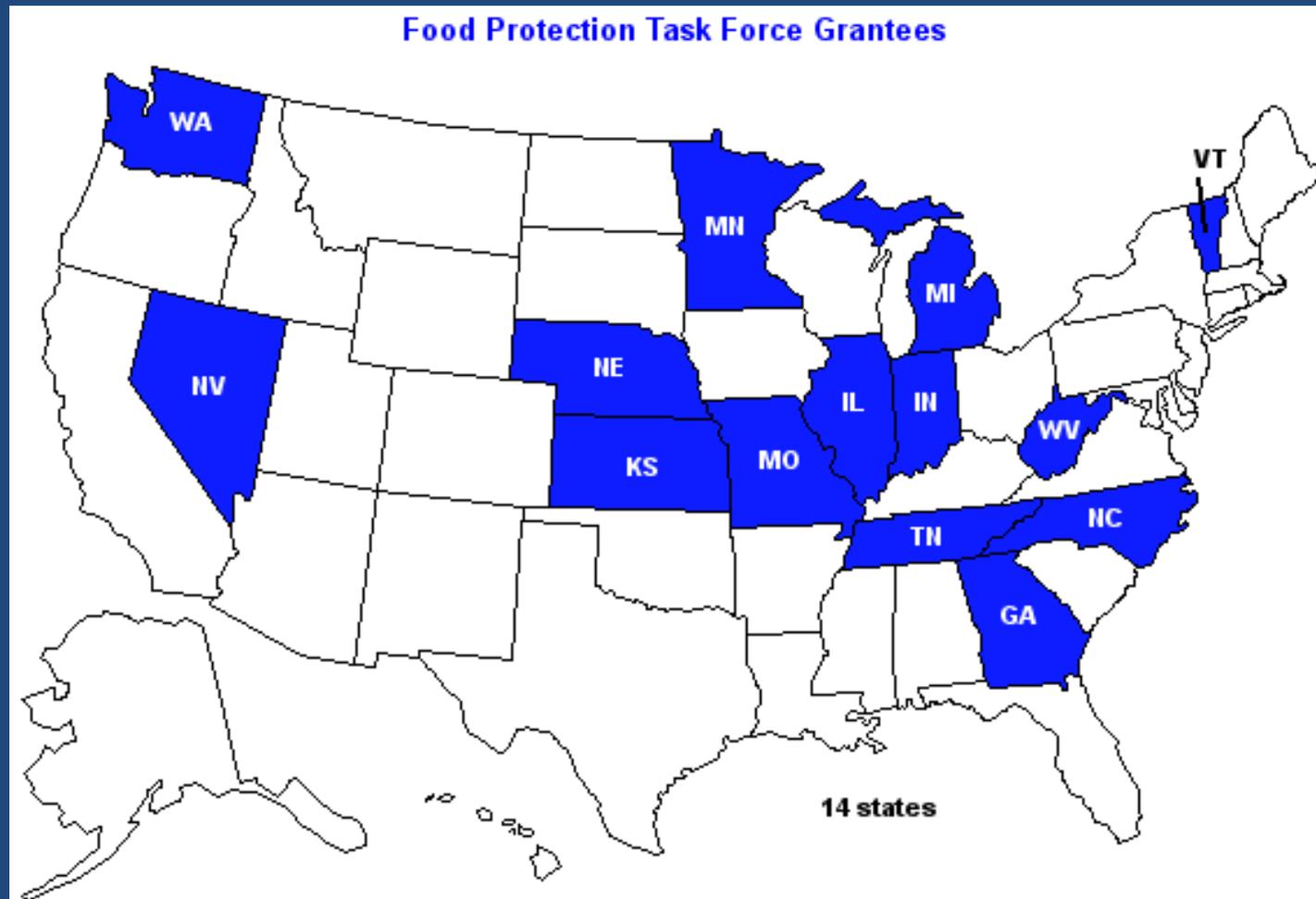
**Produce Safety Alliance Recruits Members for Working Committees, Launches Website**  
The Produce Safety Alliance (PSA) today announced the official launch of its website...

### State News

The Division of Federal-State Relations brings you the latest from the world of food safety. On this page you will find news feeds from other federal agencies and news organizations regarding the safety of the nation's food supply.



# Other States' Work



IA – [ia.foodprotectiontaskforce.com/](http://ia.foodprotectiontaskforce.com/)



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MEETINGS

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CONTACT



Feeling Queasy?  
Call, it's Easy!

**844-IowaSic**  
(or your local health department)  
to report **food poisoning**





COOLING OF LARGE QUANTITIES OF MEAT FOR SAFETY (CHINESE)



## Cooling of Large Quantities of Meat for Safety (Chinese)

Filmed in a traditional American BBQ Restaurant, this video demonstrates proper procedures for cooling large quantities of cooked meat. This video is recorded in Chinese, with English subtitles.

### Video Series

Food Safety

### Tags

Meat, Safety, Chinese, Meat, Safety, Chinese

**Reheating:** Reheat cooled meats to 74°C (165°F) within two hours of starting the process. Use an oven, commercial steamer, stovetop or rethermalizer.

# TN – [www.foodsafetytaskforce.org/](http://www.foodsafetytaskforce.org/)



The screenshot shows the homepage of the Tennessee Food Safety Task Force website. On the left is a vertical navigation menu with five items: 'HOME' (house icon), 'ABOUT' (person icon), 'MEMBERS' (document icon), 'RESOURCES' (computer monitor icon), and 'CONTACT' (envelope icon). The main content area features the Tennessee Food Safety Task Force logo (a stylized star) and the text: 'WE ARE THE TENNESSEE FOOD SAFETY TASK FORCE. ENHANCING FOOD SAFETY FROM FARM TO FORK THROUGH COLLABORATION, PROMOTION AND EDUCATION.' Below this is a large photograph of various fresh food items including asparagus, tomatoes, apples, grapes, strawberries, carrots, a whole chicken, eggs, a glass of milk, a wedge of cheese, and bread.



Tennessee Food  
Safety Task Force



HOME



ABOUT

## ACTIVE MEMBERS



# The Kansas FPTF Needs:

- Ideas for the Kansas FPTF
- FPTF Steering Committee
- Help spreading the word about the Kansas FPTF



# What Do You Think?



# Questions

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# The Food Recall Process – Food Industry

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Division Recall Coordinator and Compliance Officer

Kansas City District Office

Division of Human and Animal Food – West II (*IA, KS, MO, NE*)

Office of Regulatory Affairs

U. S. Food and Drug Administration



# Disclaimer

- The statements herein represent my best judgment as an employee of FDA at this time but do not constitute an advisory opinion, do not necessarily represent the formal position of FDA, and do not bind or otherwise obligate or commit the agency to the views expressed. See 21 CFR 10.85

# What is a recall?

- Is it the same thing as a Market Withdrawal?
- What about a Stock Recovery?
- FDA has a specific definition from the regulations. 21 CFR 7.2(g):
  - “*Recall* means a firm's **removal** or **correction** of a **marketed** product that the Food and Drug Administration considers to be in **violation** of the laws it administers and against which the agency would initiate legal action, e.g., seizure. *Recall* does not include a market withdrawal or a stock recovery.” (bolding mine, italics original)

# What is a recall?

- “Removal” means bringing the product back to you. So, if it hasn’t left, it isn’t a removal. If you tell a customer to “quarantine” the product, that is not a removal.
- “Correction” means bringing the product in compliance with the law by either correcting the violative condition OR by rendering the product into something that is no longer a food (destroying it or converting it to a non-food use).
- “Marketed” means the product is not under your control: either in your facility or at a distribution center you own or control. Once it is in the hands of a separate entity (a wholesaler, a retailer, a consumer) it is marketed product.

# Why recall?

## Industry might recall because

- They wish to protect their customers from a potentially hazardous situation
- They wish to maintain good relations and credibility with their customers
- To avoid FDA or state or local public health agencies taking judicial action
- To limit their own civil or criminal liability

## FDA is it interested in recalls conducted by industry because

- It is often the fastest and most effective way to remove violative and potentially hazardous product from the market and protect the public

# Types of recalls

1. **Voluntary:** Almost all recalls are voluntary. Voluntary recalls are recalls where the recalling firm decides to recall without a specific legal order from FDA (or other responsible agency) to recall.
  - **FDA-requested recalls:** A type of voluntary recall where FDA formally requests that a firm recall. An FDA-requested recall is a situation where:
    - The distributed product presents either a risk of illness, injury, or gross consumer deception
    - The responsible firm has not initiated a recall on their own
    - An agency action is necessary to protect public health and welfare
    - You should not wait for FDA to formally request for you to recall: you probably will not get one.

# Types of recalls

2. FDA-Mandated recall: written order by FDA to recall a product, section 423(a) of the FD&C Act
  - Reasonable probability the article of food is adulterated or misbranded and the use of or exposure to such article will cause serious adverse health consequences or death to humans or animals (SAHCODHA)
  - FDA has provided the firm an opportunity to recall voluntarily.
  - The firm refuses or does not voluntarily halt distribution or recall in the time and manner prescribed by FDA (if so prescribed).

# Reporting of recalls

- The Agency **requests** that whenever a firm decides to conduct a recall of an FDA regulated product that they inform the recall coordinator in their district. For food recalls, this information is provided on a **voluntary** basis under 21 CFR part 7. However, there are **mandatory** reporting requirements of certain types of adulteration and misbranding of food:
  - **Infant Formula Act:** Requires mandatory reporting to the FDA shipments of infant formula that may not provide required nutrients; or may otherwise be adulterated or misbranded, Section 412 of FD&C Act.
  - **FSMA:** Requires mandatory reporting (via RFR) when there is a reasonable probability an article of food (other than infant formula) that a firm has manufactured, processed, packed, OR held is adulterated or misbranded and poses a reasonable probability that exposure to the food will cause SAHCODHA, Section 417 of FD&C Act.



# Mandatory RFR reporting

- Reportable Food Registry (RFR) requires a responsible party to file a report through the electronic portal when the food can cause serious adverse health consequences or death to humans or animals
- If the food has left the control of the firm, the firm should conduct a recall (or their supplier should conduct a recall)
- RFR provides for FDA to become aware of situations where a recall should be initiated



# Recall Process (industry)

- Identify a problem
  - Customer complaints
  - Test results (internal, customer, FDA or KDA)
  - A recall notice from an ingredient supplier
- Contact your local FDA recall coordinator
  - In Kansas, that is me.
- Determine scope
  - How much product is affected?
  - Preliminary root cause can give clues, but be conservative. Using an overly narrow scope could require an expanded recall later which delays the removal of dangerous product from the market.



# Recall Process (industry)

- Identify consignees
  - Ideally, you should be able to identify the accounts who received the specific lots or date range of product subject to recall.
  - If not, it may be necessary to contact any account who *may have* received product.
- Contact consignees
  - Phone, email, regular mail etc.
  - Even if initial contact is by phone, there are advantages to following up with a written communication
    - Provides a clear record of what you instructed your customers to do.
    - Including a response form can provide you with documentation that the consignee read and understood the recall notice.
- Issue public notice (in Class I situations)
  - Press release or posting on your website.

# Recall Process (industry)

- Accept returned product
  - Keep records of the amount returned.
  - Keep returned product separate from other product so it isn't inadvertently redistributed.
- Contact non-responding consignees
  - Keep records of who responded to you about the recall.
  - Make attempts to contact non-responders
  - Record those attempts
  - Make at least 3 attempts to contact non-responders on 3 separate days.

# Recall Process (industry)

- Correct product
  - Destroy or render for non-FDA regulated use (cooking oil turned into biodiesel)
    - Keep records of the destruction (I will ask you for them).
  - Recondition the product
    - FDA will need to review the reconditioning proposal (I can send you a template of the information I will need)
    - Diverting the product for animal food is a type of reconditioning because FDA regulates animal feed. We will need to review the reconditioning proposal for this purpose.
- Complete root cause investigation
- Identify corrective and preventative actions.



# Recall Process (FDA)

- Recall awareness
  - When I learn that a recall is being planned or already initiated, I create a record in our system called a Recall Alert
    - It may be from a call from a firm
    - The result of an FDA or KDA inspection
    - An RFR was filed.
  - I will reach out to the firm if they haven't called me yet.
    - I will work with them on their recall letter or public notice (if necessary)
- Recall recommendation
  - After the recall is initiated, I will ask the firm to provide me with responses to a questionnaire (aka recall information letter aka Attachment B information)
  - The information requested is what I need to submit the recommendation that the recall be classified.

# Recall Process (FDA)

- Recall classification.
  - The experts in an FDA center will classify the recall.
    - Human food: Center for Food Safety and Applied Nutrition (CFSAN)
    - Animal feed or pet food: Center for Veterinary Medicine (CVM)
  - Class I: a situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious adverse health consequences or death.
  - Class II: a situation in which use of, or exposure to, a violative product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote.
  - Class III: a situation in which use of, or exposure to, a violative product is not likely to cause adverse health consequences.



# Recall Process (FDA)

- Recall classification letter
  - Class I letters come from the letter
  - Class II and III letters come from me
  - Officially notify you of FDA's classification level
  - Request status updates on the recall until completion
- Recall published in FDA's enforcement report
- Monitor the recall until completion

# Recall Process (FDA)

- Issue audit check assignment
- Terminate the recall once all the information necessary has been submitted
  - All the product recovered has been recovered
  - Recovered product has reached its final disposition (destroyed or corrected)
  - Root cause investigation is complete
  - CAPA is complete
  - Effectiveness checks are complete
  - Recall audit checks are complete
- Send the firm a recall termination letter

# LINKS

- “ORA Recall Coordinators” (Find your local recall coordinator)  
(<https://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129334.htm>)
- “FDA recall guidance for industry” (Attachment B information)  
(<https://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129259.htm>)
- “FDA recall guidance” (Recall letter, response forms, and press release templates)  
(<https://www.fda.gov/Safety/Recalls/IndustryGuidance/default.htm>)
- “21 CFR part”  
<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=7>



# Human Food By-Products For Use As Animal Food



# Sampling

- Commercial Feeds
  - Manufacturer
  - Retail
- Livestock, Pet Food, Feed Ingredients
- AAFCO Feed Inspectors Manual

# July 1, 2016 – June 20, 2017

- 1,734 Samples
  - 1,357 Livestock
  - 193 Pet Food
  - 179 Feed Ingredient
  - 5 Complaint

Brand Name
Product Name
Purpose Statement & (medicated claim if required)
Drug Guarantee (if applicable)
Guaranteed Analysis
Ingredient Statement
Use Directions
Precautionary Statement (if required)
Responsible Party's Name & Address
Quantity Statement

**YOUR NAME FEEDS**

Duck Starter



A starter feed for ducks

Guaranteed Analysis

Crude Protein, minimum .....	22.0%
Crude Fat, minimum .....	4.0%
Crude Fiber, maximum .....	6.0%
Calcium, minimum .....	0.65%
Calcium, maximum .....	1.15%
Phosphorus, minimum .....	0.5%
Salt, minimum .....	0.35%
Salt, maximum .....	0.85%

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Animal Protein Products, Lignin Sulfonate, Vitamin A Supplement, D-Activated Animal Sterol (source of Vitamin D<sub>3</sub>), L-Lysine, DL-Methionine, Riboflavin Supplement, Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Menadione Sodium Bisulfite Complex (source of Vitamin K Activity), Folic Acid, Dicalcium Phosphate, Salt, Copper Sulfate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Calcium Iodate, Sodium Selenite.

FEEDING DIRECTIONS

Feed as sole ration. Provide fresh water at all times.

**CAUTION: Do not feed to cattle or other ruminants.**

YOUR NAME FEEDS  
City, State Zip

NET WT 50 LB (22.67 kg)

<u>Proximate Analysis</u>	<u>Minimum Guarantee</u>	<u>Official Method</u>
Crude Protein	NONE	AOAC 976.05
Moisture	NONE	AOAC 934.01
Urea (non-protein nitrogen) -NPN	7-60%	AOAC 941.04
Crude Fat	3-20%	AOAC 2003.06
Crude Fiber	2-30%	AOAC 962.09
<u>Minerals by ICP-OES</u>	<u>Minimum Guarantee</u>	
Calcium	0.5-25%	SDSU-Mineral Determination 2006
Copper if <300	0.03-1.00%	SDSU-Mineral Determination 2006
Iron	0.01-5.00%	SDSU-Mineral Determination 2006
Magnesium	0.01-15.0%	SDSU-Mineral Determination 2006
Manganese	0.01-15.0%	SDSU-Mineral Determination 2006
Phosphorus	0.5-20.0%	SDSU-Mineral Determination 2006
Potassium	0.04-8.00%	SDSU-Mineral Determination 2006
Zinc	0.002-6.00%	SDSU-Mineral Determination 2006
Salt (as NaCl)	0.5-14.0%	AOAC 969.10
<u>Vitamins by UV</u>	<u>Minimum Guarantee</u>	
Vitamin A	1200-218,000 IU/lb	AOAC 974.29
<u>Antibiotics by MS/MS</u>	<u>Minimum Guarantee</u>	
Chlortetracycline	10.0-260g/T	JAOAC VOL 74 & 95, AOAC VOL 80
Oxytetracycline	10.0-300g/ton	JAOAC VOL 95 #4, AOAC 2008.09
Tylosin (not in presence of Urea)	10.0-150g/ton	Waters adaptation of AOAC 2008.01
<u>Antibiotics by UV</u>	<u>Minimum Guarantee</u>	
Monensin	10.0-200g/ton	AOAC 2006.01
<u>Antibiotics by Fluorescence</u>	<u>Minimum Guarantee</u>	
Lasalocid	500.0-1100g/ton	AOAC 2008.01
<u>Drugs by Fluorescence</u>	<u>Minimum Guarantee</u>	
Decoquinat	NONE	AOAC 2008.08
<u>Drugs by Spectrophotometry</u>	<u>Minimum Guarantee</u>	
Sulfamethazine	0.010-0.033%	AOAC 974.46
Amprolium	0.010-0.014%	AOAC 999.16
<u>Mycotoxins</u>	<u>Minimum Guarantee</u>	
Aflatoxin	NONE	FDA VOL 29 #9
Vomitoxin (DON)	NONE	FDA VOL 29 #9

# Failures

- ~20% failure
  - Proximate Analysis
  - Drugs
  - Antibiotics
  - Mycotoxins

# Enforcement Actions

- Informational Letter
- Stop Sales
- Civil Penalty
- Suspension or Revoking of License

# Complaints

- Documented
- Evaluated
- Answered
  
- Animal sickness
- Feed quality
- Facility

# Questions

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# Food Safety Inspection Program



Autumn Schuck, Inspection Manager  
Kansas Department of Agriculture

# Overview

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- Inspection approach
- Number of inspections conducted
- Frequent violations
- Complaints
- Key points

# Inspection Approach

- Educate, Warn, Enforce
- Evaluate systems
- Encourage dialogue before, during, and after inspection

# 3rd Quarter Inspection Data, 2017

- 5,351 inspections were conducted
- Most common reasons for inspection
  - Routine – 3,118
  - Follow-up – 694
  - Complaint/modified complaint – 512
  - Licensing – 494
  - First operational inspection after licensing – 218



# Frequent Violations

## Food Establishment



### Violation

- Toxic substances properly identified, stored and used
- Food-contact surfaces: cleaned and sanitized
- Physical facilities installed, maintained and clean
- Proper date marking and disposition
- Proper cold holding temperatures

### Citation Frequency

Found on 25% of inspections.

Found on 25% of inspections.

Found on 22% of inspections

Found on 18% of inspections

Found on 16% of inspections

# Frequent Violations

## Food Establishment - Tips for Compliance

- Regularly check Food contact surfaces:
  - Utensil drawers for dried food debris
  - Ice machines for mold
  - Sanitizing solution (concentration/equipment)
  - Counters - must be cleaned and sanitized

- Identify cleaners, sanitizers, and other liquids by common name
- Check daily for out-of-date items in cooler and freezer
- Keep walls, floor, and area around equipment free of food debris and trash
- Store foods not to be contaminated

**Kansas**  
Department of Agriculture

**Food Safety Fact Sheet**  
Daily Self-Inspection Checklist

Establishment: \_\_\_\_\_ Time: \_\_\_\_\_ Initials: \_\_\_\_\_  
Date: \_\_\_\_\_

**\*These items contribute directly to foodborne illness.**

**Cold Holding\* (Refrigerated at 41°F)**

Item	Location	Temperature	Corrective Action Taken

**Cooking\* (Whole muscle meat to 145°F, ground meat to 155°F and poultry/injected foods to 165°F)**

Item	Location	Temperature	Corrective Action Taken

**Hot Holding\* (Refrigerated at 132°F)**

Item	Location	Temperature	Corrective Action Taken

**Cooling\* (From 132°F to 70°F within 2 hours and from 70°F to 41°F within another 4 hours)**

Item	Location	2 hour temp.	4 hour temp.	Corrective Action Taken

**Reheating\* (Heat to 165°F for 15 seconds within 2 hours)**

Item	Location	Temperature	Corrective Action Taken

**Hand Sinks**

In	Out	Corrective Action Taken

Kansas Department of Agriculture | 1320 Research Park Drive | Manhattan, KS 66502 | (785) 564-6767 | agriculture.ks.gov

Handout #42: Daily Self-Inspection Checklist Page 1 (two-sided)  
May 2012

# Frequent Violations

## Food Processing

### Violation

- Doors, windows and other openings protected to eliminate entry by insects, rodents, and other pests
- Labeling
- Storage of detergents, sanitizers, and hazardous materials

### Citation Frequency

- Found on 21% of inspections
- Found on 9% of inspections
- Found on 7% of inspections



# Frequent Violations

## Food Processing - Tips for Compliance

- Regularly check exterior doors for gaps
- Refer to #29 Labeling Handout
- Training and oversight on chemical storage

Every package of food must have the following information on its label:



- The common and usual name of the product.
- The name and street address, including city and zip code, of the manufacturer or distributor.
- The net weight.
- A list of ingredients in the order of their prevalence.
- The common name of the food source of each of the eight major food allergens contained in the product, including:
  - (A) Milk;
  - (B) egg;
  - (C) the specific type of each fish, such as anchovy or tuna;
  - (D) the specific type of crustacean shellfish, such as crab or lobster;
  - (E) peanuts;
  - (F) the specific type of each tree nut, such as walnut or pecan;
  - (G) wheat; or
  - (H) soybeans.
- A qualifying statement like "Manufactured for" or "Distributed by", as applicable.
- Nutrition facts, unless exempted.

Amount per Serving		% Daily Value*	Amount per Serving		% Daily Value*	Percent Daily Values are based on a diet of other people's misdeeds.		
Total Fat 15g		30%	Total Crustaceans 10g		20%	*Percent Daily Values are based on a diet of other people's misdeeds.		
Saturated Fat 3.5g		7%	Sodium 100mg		20%	Total Fish 5g		10%
Trans Fat 0.5g		1%	Cholesterol 50mg		10%	Total Shellfish 5g		10%
Dietary Fiber 2.5g		5%	Total Protein 10g		20%	Total Allergens 10g		20%
Dietary Protein 10g		20%	Total Sugar 10g		20%	Total Nuts 5g		10%
Total Sugar 10g		20%	Total Fiber 2.5g		5%	Total Tree Nuts 5g		10%
Total Fiber 2.5g		5%	Total Wheat 5g		10%	Total Soybeans 5g		10%
Total Wheat 5g		10%	Total Soybeans 5g		10%	Total Mustard 5g		10%
Total Soybeans 5g		10%	Total Mustard 5g		10%	Total Other 5g		10%
Total Mustard 5g		10%	Total Other 5g		10%	Total 100g		100%
Total Other 5g		10%	Total 100g		100%	Total 100g		100%

Required information must be printed in type of sufficient size and prominence to be easily read under the normal conditions of sale and display. This information should be printed on the main part of the label in a color that contrasts with its background.

Required information must be in English.

The term "package" means any food that has been put into a bottle, can, carton, bag, or secure wrapper, by either a food establishment or a food processing plant, before it is offered for wholesale or retail sale.

# Food Establishment and Food Processing Complaints 3<sup>rd</sup> Quarter

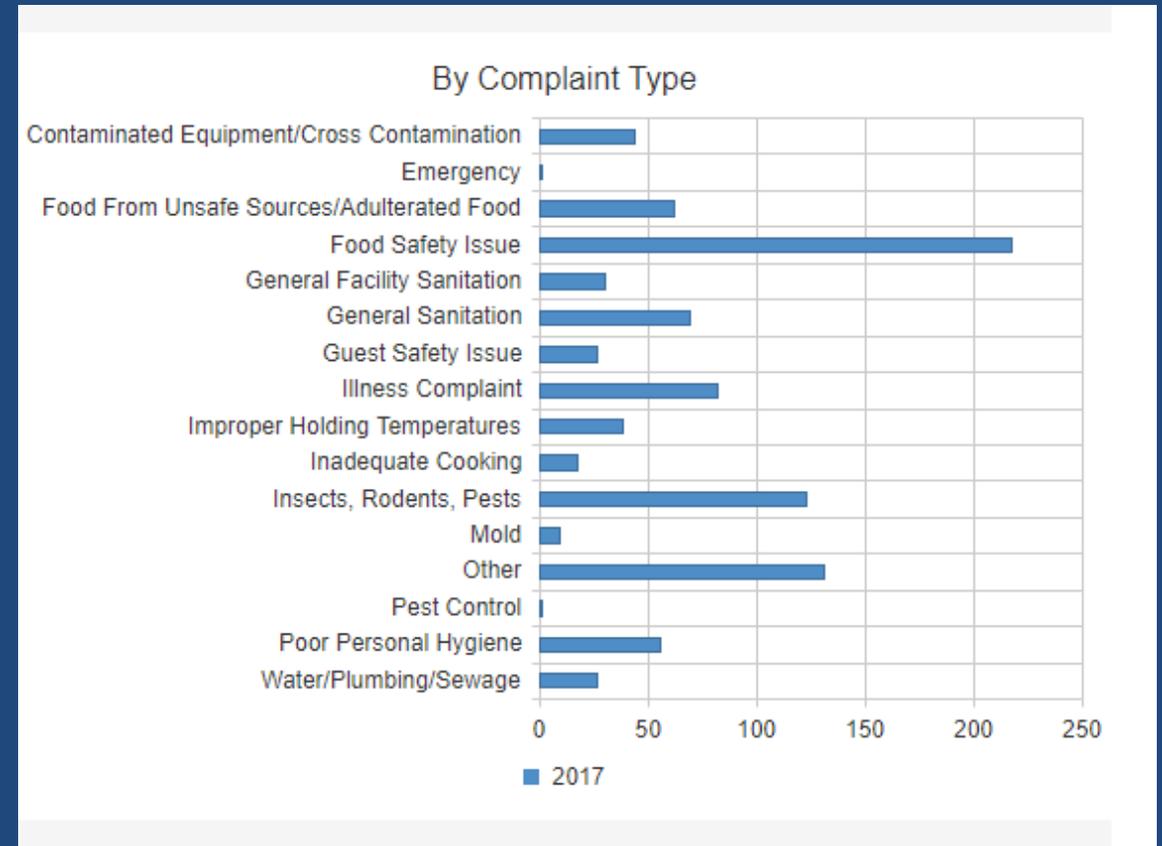


512 complaints made

–672 Q2

Top 4 complaint types:

1. Food Safety Issue
2. Other
3. Insects, rodents, pests
4. Illness complaint



# Key Points

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- Communication is KEY!
- Discuss with your staff the importance of food safety
- Be your own inspector

# Questions

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# Small Group Discussions

*For those of you on the phones: We will take a 45 minute break for our small group discussions. Your phone lines will be muted until we return.*

Get into groups based on your area of industry and answer the following two questions:

- What is the biggest concern for your industry segment?
- How can the Kansas Food Safety Task Force help with this concern?





# Produce Safety Rule



## Official Name:

Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption

## Better Known As:

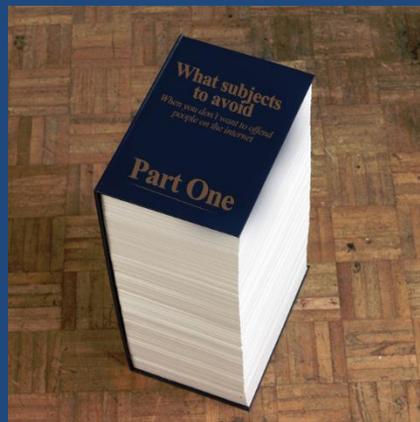
# The Produce Safety Rule



# Food Safety Modernization Act (FSMA)

FSMA provides FDA with new enforcement authorities related to food safety standards, gives FDA tools to hold imported foods to the same standards as domestic foods, and directs FDA to build an integrated national food safety system in partnership with state and local authorities.

Manufactured Food Regulatory Program Standards (MFRPS)



Preventative Controls for Human Foods (PC Human Foods)

Produce Safety Rule

# What is the Produce Safety Rule?

- Water
- Soil Amendments
- Sprouts
- Animals
- Worker health, hygiene and training
- Equipment, tools and buildings

# Water Quality

Why does testing agricultural water matter?

Many kinds of illness causing bacteria thrive in moist environments. The FDA estimates that safe water will reduce foodborne illness caused by produce by 20%.

What are the tests looking for?

generic E. coli – indicates fecal contamination

Who made this determination?

The US EPA has required water quality monitoring under the Clean Water Act for many years. The FDA has recognized EPA approved, scientifically validated methods as acceptable.



# Soil Amendments

What are soil amendments?  
compost, manure

What are the risks?  
E. coli and Salmonella

What are the rules?  
Compost that has undergone a scientifically validated process

- An aerated static pile reaching 131F for 3 consecutive days, or a turned compost pile reaching 131F for 15 days not necessarily consecutive, which must be turned at least 5 times
- Compost must be cured (temperature has fallen to match the ambient air temperature)



# Sprouts

What are sprouts?

Germinated seeds, usually mung bean, alfalfa or soybean, eaten raw or cooked

What makes sprouts risky?

Bacteria, viruses and parasites

Listeria, Salmonella and E. coli

- A single bacterium in a kilogram of seed can be enough to contaminate a whole batch of sprouts
- The sprout growing process takes place in conditions that are ideal for bacterial growth



What are the rules for sprouts?

Same as other produce

Compliance dates sooner than other produce

# Animals



Working animals

What are the risks?

Fecal contamination

What are the rules?

Don't harvest visibly contaminated produce

Limit the presence of animals in produce fields as much as possible, especially during the growing season



Wildlife

# Worker health, hygiene and training

## What are the risks?

- Bacteria
  - Fecal / oral transmission
- Viruses
  - Hepatitis A and norovirus
- Worker safety
  - Protection from illness and injury



## What are the rules?

- Handwashing
- Proper restroom facilities
- Healthy employees
- Proper clothing
- Good training and training records

# Equipment, tools and buildings

What are the rules?

- Use food grade materials
- Keep everything in good shape
- Cleanliness is key
- Think about EVERYTHING that touches the food
  - Knives
  - Tables
  - Shovels
  - Baskets
  - Crates
  - Harvest equipment

What are the risks?

- Physical contamination
- Chemical contamination
- Bacterial, viral, parasitic contamination



# Compliance Dates

Business Size	 Compliance Dates for Sprouts	 Compliance Dates For Most Produce	 Water Related Compliance Dates <sup>1</sup>	Compliance Date for Qualified Exemption Labeling Requirement <sup>2</sup>	Compliance Date for Retention of Records Supporting a Qualified Exemption
All other businesses (>\$500K)	1/26/17	1/26/18	1/26/22	1/1/2020	1/26/16
Small businesses (>\$250K-500K) <sup>3</sup>	1/26/18	1/28/19	1/26/23		
Very small businesses (>\$25K-250K) <sup>4</sup>	1/28/19	1/27/20	1/26/24		

# Want more information?

Kansas Department of Agriculture

Food Safety and Lodging 785-564-6765

Carly Tyler [carly.tyler@ks.gov](mailto:carly.tyler@ks.gov)

Agricultural Marketing, Advocacy, and Outreach

Lexi Wright [lexi.wright@ks.gov](mailto:lexi.wright@ks.gov)

Kansas State University Research and Extension

Contact your local extension agent

<https://www.ksre.k-state.edu/about/stateandareamaps.html>

Londa Nwadike [lnwadike@k-state.edu](mailto:lnwadike@k-state.edu)

# Intentional Adulteration Overview



Adam Inman, Assistant Program Manager  
Kansas Department of Agriculture

# Today We're Going To Talk About...

- What is intentional adulteration?
- Has it ever happened?
- What can I do about it?

# What is intentional adulteration?

- Doing bad things to food on purpose
- Food Protection = Food Safety + Food Defense
- Food Safety = Preventing accidental bad things that happen to food
- Food Defense = Preventing bad things done to food on purpose

# What is intentional adulteration?

- Economically motivated adulteration (EMA)
  - Fraudulent, intentional substitution or addition of a substance in a product for the purpose of increasing the apparent value of the product or reducing the cost of its production, i.e., for **economic** gain.
- 300,000 illnesses in China from melamine adulteration of infant formula
- Many foods lend themselves to (EMA)

# What Would Jason Do?

- “Do you know where the exits are?”
- “DO something. DO anything!”



# Examples

- 1984 Oregon Rajneeshee Attack
  - Put *Salmonella* in foods at multiple salad bars
  - Over 750 Ill
  - Attempt to sway county election



# Examples

- 2003 Michigan Meat Department Nicotine Poisoning
  - An employee put Black Leaf 40 insecticide in 200 pounds of meat
  - 92 illnesses identified
  - Black Leaf 40 contained 40% nicotine – EPA canceled product registration in 1992 because of its toxicity.



# Examples



- 2009 Kansas Salsa Pesticide Poisoning
  - Niece of restaurant owner put Methomyl in salsa
  - 2 events
  - 48 cases
  - Niece's husband was the “Mastermind”

# What can I do?



**EMPLOYEES**  
are the  
**FIRST**  
Line Of Food Defense

**F**ollow company food defense plan and procedures.

**I**nspect your work area and surrounding areas.

**R**ecognize anything out of the ordinary.

**S**ecure all ingredients, supplies, and finished product.

**T**ell management if you notice anything unusual or suspicious.

In today's world it is important to be **ALERT** to protect your business.

**A** How do you **ASSURE** that the supplies and ingredients you use are from safe and secure sources?

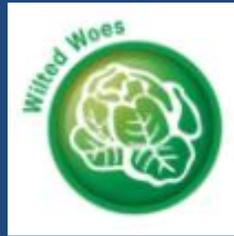
**L** How do you **LOOK** after the security of the products and ingredients in your facility?

**E** What do you know about your **EMPLOYEES** and people coming in and out of your facility?

**R** Could you provide **REPORTS** about the security of your products while under your control?

**T** What do you do and who do you notify if you have a **THREAT** or issue at your facility, including suspicious behavior?

# Exercise!



- Food Related Emergency Exercise Bundle (FREE-B)



## How Sweet It Is(n't)

This scenario focuses attention on the regulatory traceback investigation that occurs after standard product testing shows that a food product contains excessive levels of a contaminant, as well as a recall of contaminated food.

# FSMA IA Rule

- Covered facilities must prepare and implement a written food defense plan
  - Vulnerability Assessment with actionable process steps
  - Mitigation strategies
    - Monitoring, Corrective Actions, and Verification
  - Reanalysis every three years or when certain criteria are met, including mitigation strategies that are determined to be improperly implemented

# Summary

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- It does happen
- You need to be ready
- There are resources to help

# Questions

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Adam Inman, Assistant Program Manager

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# Available Resources



Amber Grisamore, Food Safety Task Force Lead,  
Kansas Department of Agriculture

# Overview

- Need for Resources
- Resources are Available
- Links Specific For:
  - Food Establishments
  - Schools
  - Food Processors/Food Storage Facilities
  - Produce Farms
  - Feed Manufacturers
- What Resources Can You Share?



# Need for Resources

- One of the Kansas Food Safety Task Force Goals
- Don't Reinvent the Wheel
- Task Force Steering Committee Is Already Helping

# There are resources available

- Kansas Department of Agriculture Food Safety

<http://agriculture.ks.gov/divisions-programs/food-safety-lodging>

- Kansas Food Code

[https://agriculture.ks.gov/docs/default-source/fsl--handouts/2012\\_kda\\_food\\_code\\_12\\_14\\_12.pdf?sfvrsn=6](https://agriculture.ks.gov/docs/default-source/fsl--handouts/2012_kda_food_code_12_14_12.pdf?sfvrsn=6)

- Kansas Restaurant and Hospitality Association

<http://www.krha.org/>



# Resources for Food Establishments

- Iowa Foodservice Employee Training Videos  
<https://www.extension.iastate.edu/foodsafety/foodservice-employee-training>
- Handwashing Signage  
<https://www.extension.iastate.edu/foodsafety/handwashing>



# Resources for Schools

- Food Safety Posters

<http://cnsafefood.k-state.edu/resources/food-safety-posters/>

- Food Allergy Videos for Training

<http://cnsafefood.k-state.edu/resources/videos.html>

<http://www.nfsmi.org/ResourceOverview.aspx?ID=490>

## DID YOU KNOW?

Properly washing hands  
12 times only takes  
a total of 4 minutes.



Handwashing helps prevent:

- Students from getting sick
- Cafeteria from getting shut down
- You losing your job

This project was partially funded through a grant from the National Integrated Food Safety Initiative (Grant No. 2004-51110-02170) of the Cooperative State Research, Education, and Extension Service, U.S. Department of Agriculture.

# Resources for Food Processors/Food Storage

- FDA Food Guidance Document

<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/>

- Food Defense Mitigation Strategies Database

<https://www.accessdata.fda.gov/scripts/fooddefensemitigationstrategies/>

# Food Defense Mitigation Strategies Database

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The Food Defense Mitigation Strategies Database (FDMSD) is a tool designed to assist owners, operators or agents in charge of companies that produce, process, store, package, distribute, and/or transport food with identifying preventive measures to protect the food against intentional adulteration. The FDMSD provides a range of mitigation strategies for individuals to consider implementing at points, steps or procedures to minimize the vulnerability to an intentional attack.



- [How to use this Tool](#)
- [Full Disclaimer](#)

## Browse by Category:

Facility-Wide Security Measures	Retail Food Service	Conveyance	Farming/Agriculture	Material Handling
Packaging	Processing	Key Activity Types (KATs)	Storage	Transportation/Distribution

Or Search by Keyword:  [Go](#)

## Choose a Point, Step, or Procedure:

• <a href="#">Bags</a>	• <a href="#">Cans</a>	• <a href="#">Plastic Container</a>	• <a href="#">Pouches</a>
• <a href="#">Bottles</a>	• <a href="#">Drums</a>	• <a href="#">Plastic Wrap</a>	• <a href="#">Super Sack</a>
• <a href="#">Boxes</a>	• <a href="#">Paper</a>		

## Review Strategy List:

It is the responsibility of the owner, operator or agent in charge to choose the strategy or combination of strategies that are most effective and appropriate for their facility. Some strategies listed within the database are meant to be implemented in conjunction with other strategies or in tandem with other food defense policies and procedures. Choosing and following strategies within this database does not constitute compliance with any FDA laws, regulations, or guidance. For information about food defense measures or policies that are recommended for an effective food defense environment please see the category titled General Information.

Bags

### Bags

- Accompany unauthorized persons (e.g., visitors, contractors, personnel) to restricted areas
- Clean / sanitize equipment and components periodically (e.g., immediately prior to use, after maintenance, when security devices are breached, following a suspect event)
- Maximize visibility of operations, equipment, and locations (e.g., install windows, light adequately, keep area clear of visual obstructions)
- Reduce the amount of product and supplies present or accessible at one time to reduce the impact of contamination

# Resources for Produce Farms

- K-State Research and Extension  
Principles of Food Safety & Hygiene for Workers on Produce Farms  
[http://www.ksre.k-state.edu/foodsafety/produce/fsma/docs/training\\_brochure.pdf](http://www.ksre.k-state.edu/foodsafety/produce/fsma/docs/training_brochure.pdf)
- K-State Research and Extension-Produce Safety Toolkit  
<https://www.ksre.k-state.edu/foodsafety/produce/>

# Resources for Feed Manufacturers

- KDA Dairy and Feed Safety  
Animal and Pet Food Resources

<http://agriculture.ks.gov/divisions-programs/dairy-inspection/feed-safety/pet-food-resources>

- Recalls
- Compliance Policy Guides
- Forms
- Weblinks



# What Resources Can you Share?

- Help Build the Task Force Resources
- Have Other Resources?

Send email to [Amber.Grisamore@ks.gov](mailto:Amber.Grisamore@ks.gov)



# Questions

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Amber Grisamore, Food Safety Task Force Lead

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# Question and Answer Session

*For those of you on the phones:*

*We will open the lines momentarily for your questions.*

*We recommend you use the chat box feature and we will read your question out loud.*



# Thank you for attending

To view quarterly newsletters and upcoming events,  
check out the Food Safety Task Force tab at:  
[agriculture.ks.gov/FSLeducation](http://agriculture.ks.gov/FSLeducation)

