



ifpti **Fellowship in Food Protection**

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IFPTI Fellowship Cohort VII: Research Presentation

Andrea Riley

An Exploratory Study of Finished Product Testing in Georgia

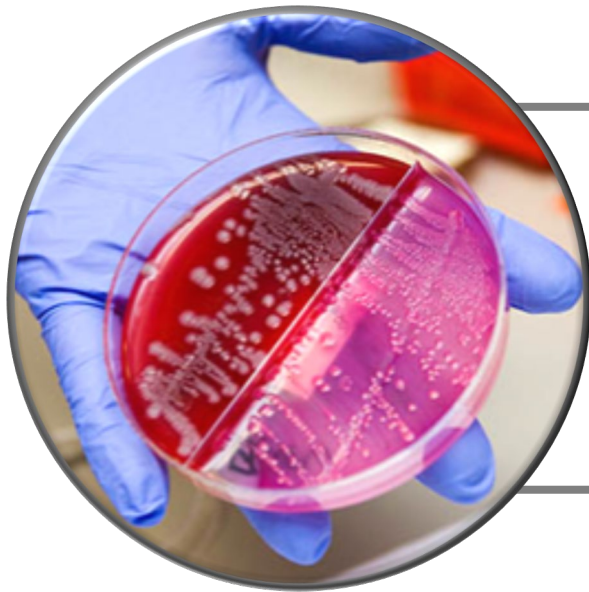
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Background

Product Testing



In 2017, removed
44 violative food
from the U.S.
market

In 2018,
9 positives
reported in
Georgia

Background



Senate Bill
80

Chapter
40-7-18

Background

FDA Requirements if Product Testing is Used	GDA Mandatory Product Testing Requirements
Be scientifically valid Identify the test microscopic organisms	Must be sufficient to detect the microscopic organism
Specify the procedures for identifying samples and relationship to lots	Samples must be representative and according to the scale of the operation
Must include number of samples and frequency	Testing must be conducted at frequency established by the department
Identify test method used Identify laboratory conducting the testing	Testing must be performed according to standards outlined by an internationally recognized certification body
Include corrective action procedures	Presumptive positives shall be carried out

Problem Statement

No study has been conducted on how Georgia manufacturers are conducting finished product testing and whether this testing can be used as a verification effort to comply with the Food Safety Preventive Control for Human Foods rule.

Research Questions

1. How are processors testing their finished products?
2. Can processors use their current testing procedures for state regulations and federal verification?

Methodology

9 question survey

- Developed to gain insight of industry practices

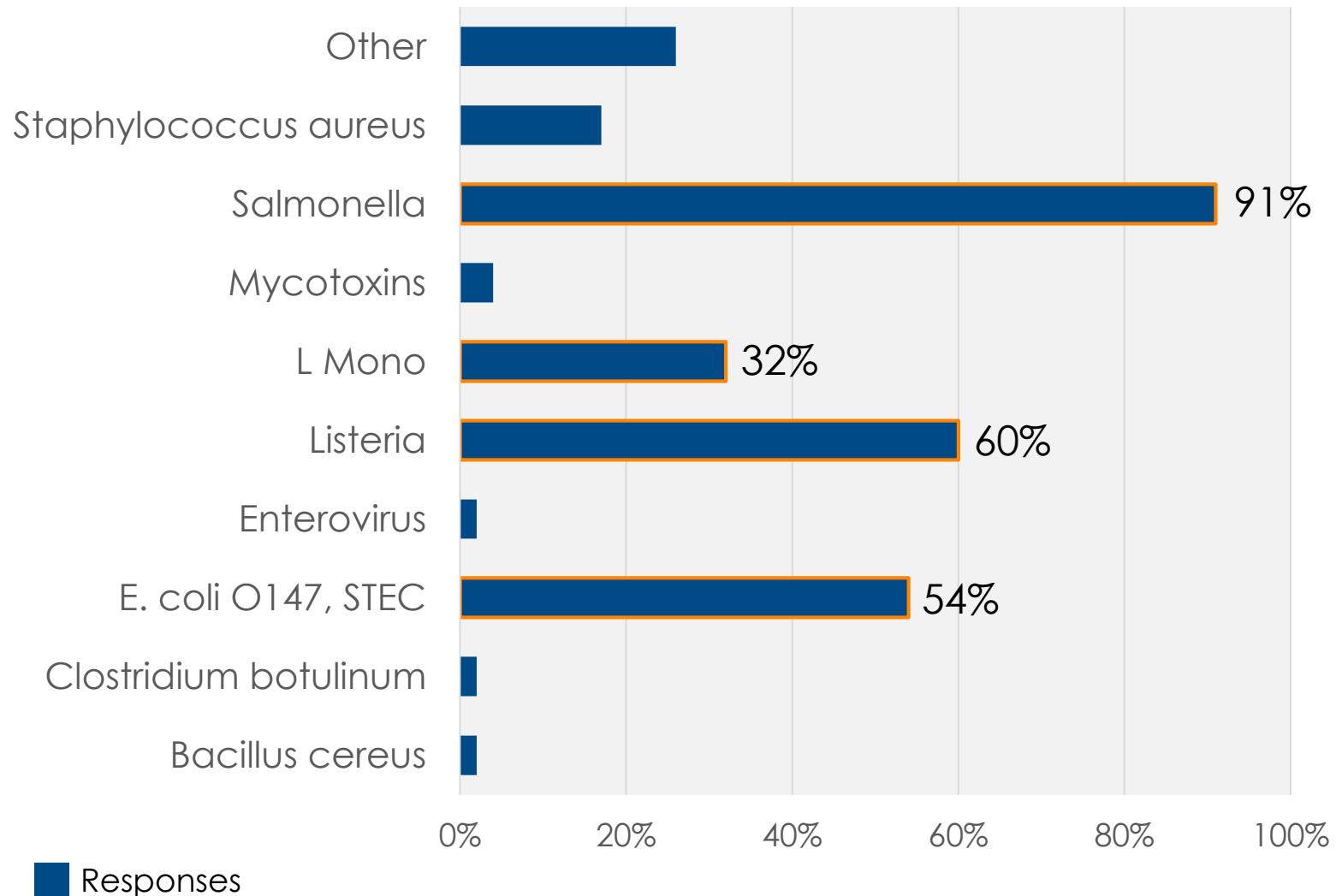
Study Population

- Georgia food processors subject to finished product testing requirements.
- 20% response rate.

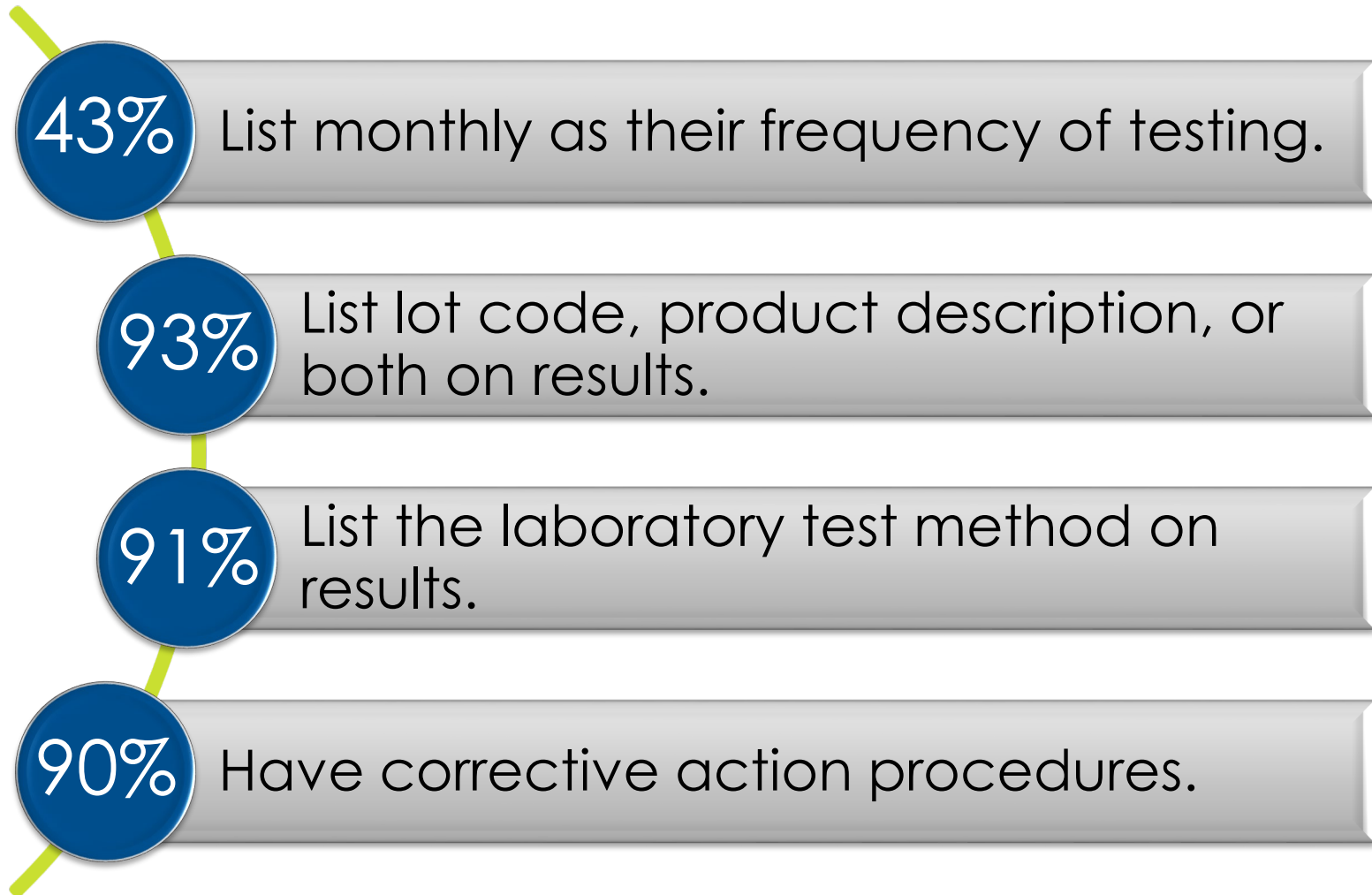
Over 25 Types of Products



Product Testing Conducted



Results



Conclusions

- In this study, the sample of Georgia facilities were found to be using product testing to verify their food safety plan.
- **28% of these firms** are able to use their testing procedures to satisfy both state and federal regulations.

Recommendations

1. Georgia facilities should modify their testing programs to meet both state and federal regulations.
2. The GDA should share report findings.
3. The Food Safety Preventive Controls Alliance should provide written guidance for verification procedures so industry can uniformly comply.

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- Cohort VII
- IFPTI staff

Questions?

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Security Breach

- Georgia only includes 2018 reports because the agency had a security breach and data before January 2018 was compromised.

GA Testing Exemptions

- No jurisdiction of USDA products.
- Bottle water are subject to testing requirements per 21 CFR 129.
- Grade A Milk and Shellfish are regulated by ordinances; not manufactured foods division.
- Small business exemption.

Monitoring vs Verification

- Monitoring- taken in “real-time”
- Verification-assessing if the system is functioning as intended.
- Lot Testing
“Hold and release” testing is a more preventive control, not verification.

Product Types

- Product types based on FDA Product Industry Codes (02-47)
- FDA RFR codes

Survey questions 1-5

1. What types of products does your firm produce?
2. What organisms does your firm test for in your products?
3. Is the laboratory test method reference listed on the results?
4. Is a lot code and/or product description on the results?
5. What is the frequency of sampling?

Survey Question 6-9

6. Does your firm have written corrective action should a suspect, presumptive or positive occur?
7. What does your firm rely on most as verification of your food safety plan?
8. Do you have any suggestions or feedback on the Georgia Finished Product Testing Requirements?
9. Do you think the Georgia Finished Product Testing requirements were beneficial in preparing your firm for the Food Safety Modernization Act Preventive Controls for Human Foods?

Pre-empted

- Why GDA requirements aren't pre-empted by PCHF?
- GDA promulgated before FSMA.

Limitations

- Limitations of product testing as a verification step
- Not in real time.
- “Hold and release” testing is a more preventive control, not verification.
- Verification-assessing if the system is functioning as intended.

GDA Frequency

- Semi-monthly-high risk
- Monthly-moderate risk
- Quarterly-low risk
- Accelerated

2017 Recalls

FDA recalls page and manually read each human food recalls that stated the product itself tested positive for a pathogen.



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