

PET FOOD SAFETY Validation 101

Pet Food Forum 2013 - Chicago, IL



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Pet Food Recalls

Steve's Real Food Recalled Due to Salmonella (3/8/2013)

Publix Chicken Tenders Dog Chew Treats Recall (1/11/2013)

Waggin' Train and Canyon Creek Ranch Chicken Jerky Treats Recall (1/9/2013)

Warning Issued for Bravo! and Steve's Real Raw Pet Foods (3/13/2013)

Jones Natural Chews Recalls Woofers Beef Patties for Dogs (3/12/2013)

Honest Kitchen Recalls Five Lots of Dog Food (2/21/2013)

Hy-Vee Dog Food Recall (2/23/2013)

IMS Trading Group Withdraws Chicken Jerky Dog Treats Due to Drug Residue (1/11/2013)

Nutri-Vet Recalls Chicken Jerky Dog Treats (2/21/2013)

<u>Kasel Recalls Multiple Brands of Dog Treats Due to Salmonella</u> (2/20/2013)

Nature's Variety Announces Dog Food Recall (2/15/2013)

<u>Kasel Dog Treats Recall Expands to Include More Products and Retailers</u> (2/22/2013)

Hartz Recalls Contaminated Dog Treats (1/26/2013)

Milo's Kitchen Recalls Chicken Jerky and Chicken Grillers Dog Treats (1/9/2013)





QUESTIONS

Am I doing enough to protect my business?

How far should I expand my cost/benefit ratio limits for safe pet food?

How can I further mitigate my risk of an event?

Am I being a good steward to the pet food industry?



QUESTIONS

Where should I design my CCP?

Validation or verification?

Which studies should I trust?

What is Validation?

What is Verification?





First Element of Validation

Scientific evidence that proves specific control measures are capable of controlling an identified hazard within the designed process

Peer-reviewed scientific journal articles, published processing guidelines, in-house data, regulatory guidelines, challenge study

Section 417.4 requires that each establishment proves/validates the adequacy of its HACCP plans





Second Element of Validation

Practical demonstration that scientifically proves the system can perform as expected

Consists of records/data which demonstrates the plan in operation and goals of HACCP are achieved

Must include practical data reflecting actual experience and circumstance





Parameters of Validation

Product Definition – formula, size, shape, density, water activity, moisture, etc...

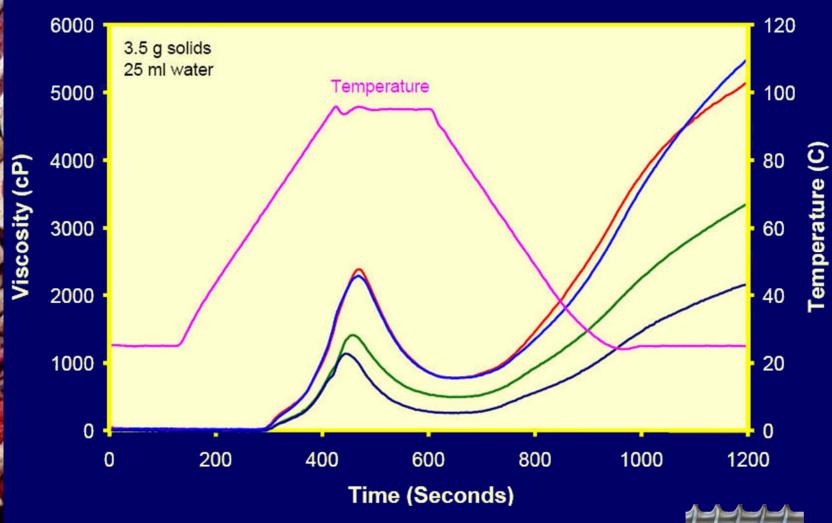
Process Architecture – capacity, L/D, SOPs

Process Operation – rate, retention time, temperature, moisture, energy

Pathogen Target & Delivery - cocktail, dry-based



Ingredient Variance





Architecture



















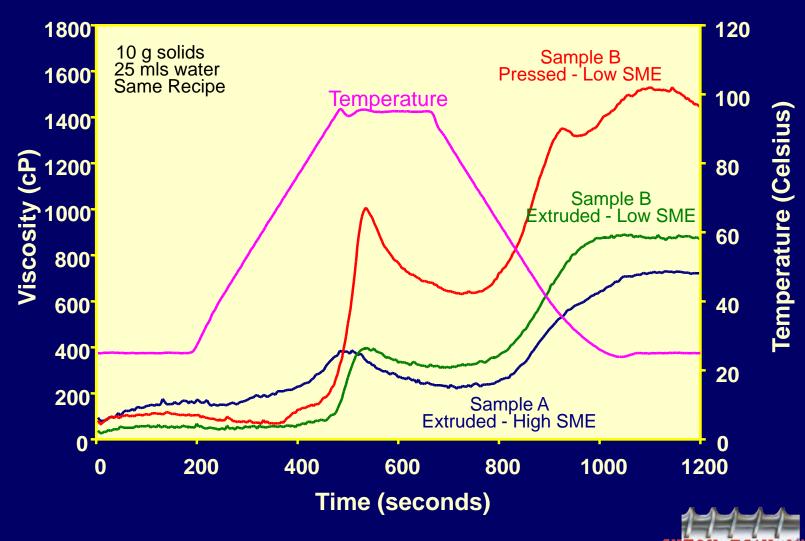


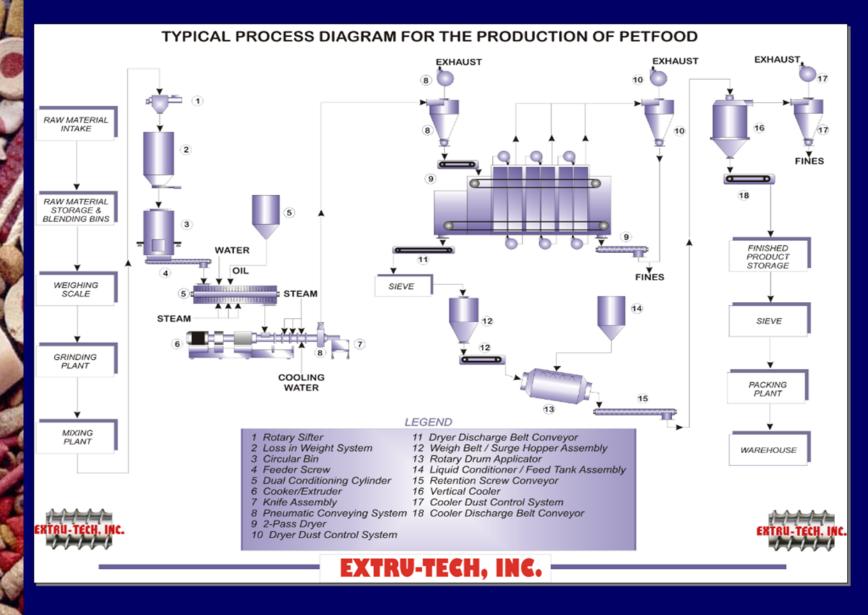






Equipment Variance









Correlation

L/D - 8 to 11

DCC Ret.Time - 15 to 30 sec.

Barrel Ret. Time - 6 to 12 sec.

Capacity - 400 to 700 lbs/hr





L/D – 12 to 13
ADP Ret.Time – 25 to 145 sec.
Barrel Ret. Time – 10 to 15 sec.
Capacity – 1,000 to 8,000 lbs/hr





Parameters of Validation Worst Case Scenario



Production at the low end of the operational window.

Realistic LIW upset/cycling Reduced ADP Retention & Efficiency



"Trouble creates a capacity to handle it. I don't embrace trouble....But I do say meet it as a friend, for you'll see a lot of it and had better be on speaking terms with it "Oliver Wendell Holmes



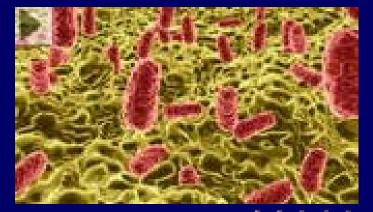
Parameters of Validation

S. Senftenberg – ATCC 43845 temperature resistance



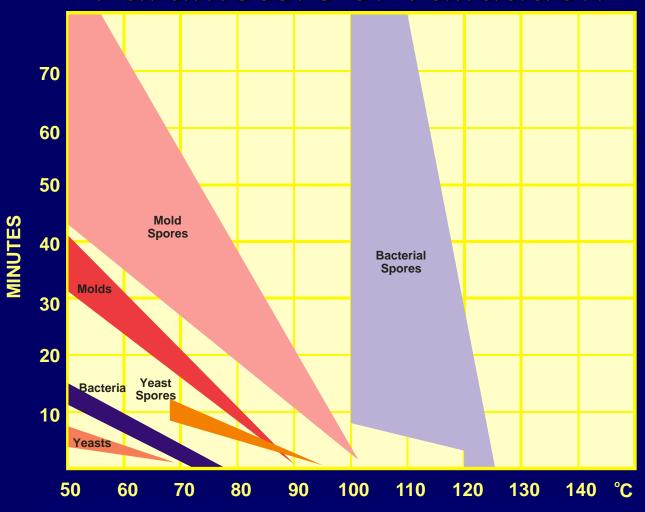
S. Typhimurium – ATCC BAA191 nalidixic acid resistance

S. Infantis – ATCC 51741 dry pet food





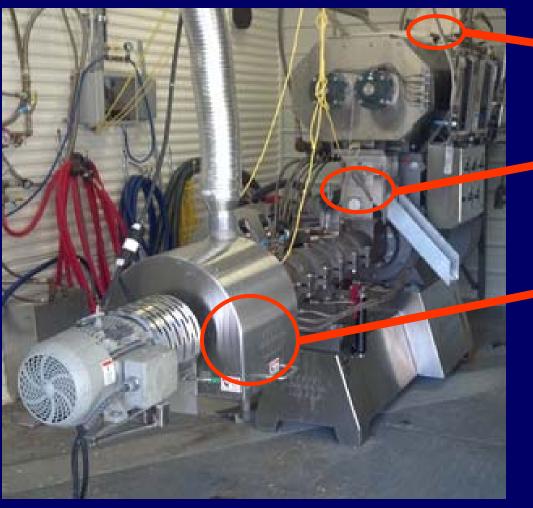
Parameters of Validation







Inoculation Methods/Procedures



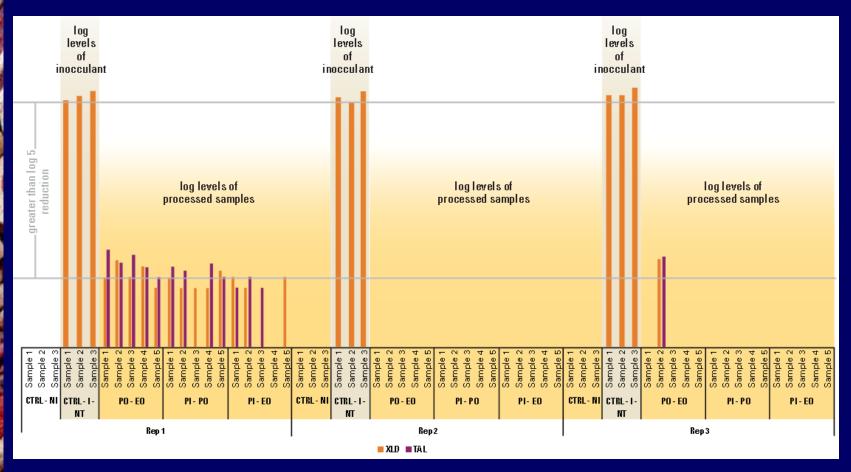
ADP Inoculation

ADP Sampling Extruder Inoculation

ADP & Extruder Sampling



VALIDATION RESULT







Implementation

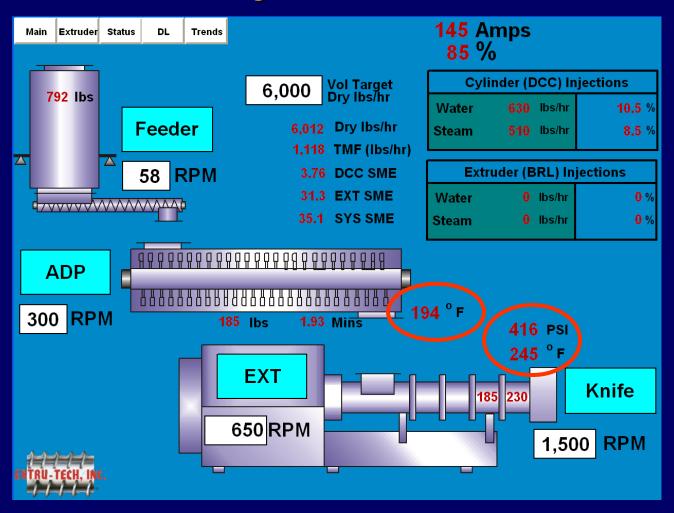
%	Product
Retracted*	Temp (C)
0	140
33.3	139
50	138
66.7	135
83.3	122
100	104







Verify & Document







COST/BENEFIT

What is the Cost?

...\$0.91 - \$3.86 USD per ton^[1]

...loss consumer/client confidence

...\$70,000,000.00 [2]

What is the Benefit?







Questions?



