



Technical Bulletin

Setting the Standard for Food Safety and Pest Management Solutions

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Intentional Adulteration

FDA FOOD SAFETY MODERNIZATION ACT

THE FUTURE IS NOW

The FDA Food Safety Modernization Act (FSMA) final rule is aimed at preventing intentional adulteration from acts intended to cause wide-scale harm to public health, including acts of terrorism targeting the food supply. Such acts, while not likely to occur, could cause illness, death, economic disruption of the food supply absent mitigation strategies.

Rather than targeting specific foods or hazards, this rule requires mitigation (risk-reducing) strategies for processes in certain registered food facilities.

The proposed rule was issued in December 2013. The changes in the final rule are largely designed to provide either more information, where stakeholders requested it, or greater flexibility for food facilities in determining how they will assess their facilities, implement mitigation strategies, and ensure that the mitigation strategies are working as intended.

In developing the rule, FDA interacted with the intelligence community and considered vulnerability assessments conducted in collaboration with the food industry.

While acts of intentional adulteration may many other forms, including acts of disgruntled employees or economically motivated adulteration, the goal of this rule is to prevent acts intended to cause wide-scale harm. Economic adulteration is addressed in the final preventive controls rules for human and animal foods. (Source: <https://www.fda.gov/>)

Submitted by: **Rich Gibson, ACE, CHA**

The Spider Beetle



Photo Courtesy of: <https://bpca.org.uk>

Order: Coleoptera **Family:** Anobiidae (Ptinidae) **Genus:** Gibbium **Species:** Various

Spider beetle, any member of about 500 species of insects sometimes considered a part of the family Anobiidae (order Coleoptera) and sometimes placed in their own family, Ptinidae. These spider-shaped beetles have a globular body, long thin legs, and no wings. They range in colour from reddish brown to black and in size from 1 to 5 mm (0.04 to 0.2 inch). There are approximately 70 genera and 600 species in the subfamily, with about 12 genera and 70 species in North America north of Mexico. The larvae are "C" shaped and cream colored with light brown heads. The length is dependent on the age of the larvae but can reach 3.5 to 4 millimeters.

The common species have similar life histories and have been reported to feed and reproduce on a wide variety of foodstuffs, including almonds, animal skins, beans, books, bones, brushes, cacao, cereals, chocolate powder, corn meal, dates, grains, hair, herbarium specimens, hops, leather, maize, nutmeg, old wood in houses, paprika, rye bread, rye, seeds, silk, stuffed birds, textile fabrics, various spices, wheat, and wool.

Control of spider beetles relies on the discovery and elimination of the infested foodstuff. In many ways, this is similar to the control of all stored-product pests, but is made exceedingly difficult because of the beetles' ability to feed on so many different items. For instance, although spider beetles may be found in the pantry, the real infestation could be in a rodent nest under the floor, in bat droppings in the attic space, or from dead overwintering insects trapped within an exterior wall.

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~ Sixty Days to Certification



Recently, a client came to us stating they need GFSI level certification ASAP. Their largest customer had unintentionally overlooked the fact they didn't have a certificate for years because of their history and now demanded they get certified. OK, no problem. RK Environmental Service's sister company, [Comprehensive Food Safety \(CFS\)](#), was up for the challenge and more than capable. The client had participated in GMP audits in the past so we were not working from a blank piece of paper but, as you know, GFSI requires a lot more.

Beginning with a gap analysis, CFS was able to determine what gaps needed to be closed between GMP and GFSI. A documented action plan was developed and ownership assigned by company, department, etc. and the process was underway. To ensure objective evidence would be available for the audit, the processes requiring records were implemented first and records were established. The written procedures/programs were developed and documented based on current practice and employees were trained. Everyone at the company was engaged, productive and supportive. This showed immediately that the food safety culture within the organization was where needed to be. Everyone chipped in, Sr. Management took responsibility for some of the actions, provided resources and really rallied the troops. The CEO worked with the team on the weekends and with third shift cleaning crew to make sure everything was buttoned up.

Everything was systematic, planned out, documented, implemented and maintained. It was quite an impressive process by each and every one contributing their efforts. After a couple of weeks on the GFSI level food safety program implementation you could see a difference in the physical structure, the people and the product. Non-conforming product holds had decreased by 33%, customer returns had been cut in half, and there were fewer customer complaints. CFS helped implement a system for managing and trending each of the holds, returns, and complaints; which ultimately identified a root cause in just a few weeks and quickly corrected.

Exactly sixty-eight days from first client visit to certification. Admittedly a CFS record, but it would not have been possible without the strong relationship and work ethic of all involved. Sure, there were a handful of minor non-conformances issued, but the dedication shown by every single employee and the CFS team made it all possible. The client has been certified for a few months now and is maintaining what they implemented and are looking forward to their unannounced audit so they can celebrate yet another win!

Take Away Tips:

- Teamwork makes the dream work
- Proper planning is as important as execution
- Culture plays a critical role in success
- Believe it, achieve it

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