



Technical Bulletin

Setting the Standard for Food Safety and Pest Management Solutions

December 2019

Volume 9, Issue 12

Ethical & Responsible Sourcing



The foods we eat in the United States could come from one of nearly 200 countries in the world. While around 85% of the food we eat is domestic, the other 15% is imported. There are roughly 125,000 food facilities plus farms supplying approximately 32 percent of the fresh vegetables, 55 percent of the fresh fruit, and 94 percent of the seafood that Americans consume annually. American manufacturers also import many of the ingredients in the domestic foods we eat. Most want to ensure the foods (and ingredients) we eat are made in an ethical and responsible manner. Ethical or responsible sourcing has been around for decades and there has been a lot more interest in the process in the past several years, so much interest that the industry has created audit programs to focus on the topic.

Second and third-party audit programs have been established to ensure suppliers are following basic guidelines to ensure all involved are acting ethically and responsibly. Sure, there are exceptions, but the systems established are making a difference. The audit program focuses on several areas:

- Labor (Child/Forced Labor, Discrimination, Discipline, Harassment/Abuse, Freedom of Association, Working Hours, Wages, Benefits, and Labor Contracts)
- Health and Safety (General Work Facility, Emergency Preparedness, Occupational Injury, Machine Safety, Safety Hazards, Chemical and Hazardous Material, Dormitory and Canteen)
- Management Systems (Documentation and Records, Worker Feedback and Participation, Audits and Corrective Action Process)
- Environment (Legal Compliance, Environmental Management Systems, Waste and Air Emissions)

An organization which makes the investment into "doing the right thing" is recognized through the audit program and are often top suppliers of choice for manufacturers and retailers alike. The implementation of an ethical sourcing program is a sound investment in people, the planet and the food supply.

Submitted by: Rich Gibson, ACE, CHA

The Almond Moth



Photo Courtesy of: www.jpmoth.org

Order: Lepidoptera **Family:** Pyralidae **Species:** *C. cautella*

The adult Almond Moth is about a 1/2 inch in length to 3/4 inch with a wingspread of about 3/4 inch. Newly emerged adults have a two-colored wing. The outer half of the wing is covered with gray/brown colored scales while the top portion is a dark tan color. The Almond Moth goes through complete metamorphosis. Adults live about 1-2 weeks, during which time each female lays an average of 114 eggs (up to 300 in some cases)

Almond moths are common in food storage and distribution warehouses. The Almond Moth will feed on many species of nuts, such as almonds, hazelnuts, walnuts, peanuts and many more. They will also feed on dried fruit, figs, dates, cocoa beans, seeds and grains. Although they have an attraction for the same pheromone as Indian Meal Moth, they will be even more readily attracted to the pheromone lures specifically designed for almond moths. The adults cause no damage. The larvae typically live inside a dense silken gallery amongst food material and the tube fills with frass. With heavy infestations, the larvae will leave the food material to pupate on the racks or walls of a storage facility. To control the Almond Moth; follow the standard IPM methods of control for stored product pests: inspect, clean and monitor. Chemical management can be attained through the use of space treatments and in extreme cases, fumigation.

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Sifter Monitoring



Most bulk ingredients at a food manufacturer pass through a foreign material removal device, such as a filter, sifter, sieve, etc. Just having a unit in place is not how it works; it has to be monitored frequently.

Working with a large commercial bakery a Comprehensive Food Safety (CFS) consultant was conducting a pre-assessment with the bakery's internal audit team before their upcoming audit and requested to review the sifter inspection and tailings records to ensure compliance. It was stated that maintenance is responsible for all aspects of the flour sifter and the Engineer was on vacation. After an hour or so the records were found and reviewed. The sifter had not been inspected in more than a month so the internal audit team went out the sifter, powered it down, locked it out and opened it to inspect. The screen for the sifter was all but missing, it had been so badly damaged there were only remnants of the screen and the metal frame that held it.

The screen was made of nylon and therefore was not detected by the metal detectors, there are a lot of brushes in use on the equipment which are made of a similar material with a similar shape so, when nylon pieces were found in product it was assumed the source was a brush and no effort to validate source was made. It was understood the mindset of the nylon pieces in the bread products was due to brush bristles coming loose so everyone followed that guidance in their investigation.

Once the source was discovered, all production was halted and product within the plant and distribution system were held and discarded. The bread had no preservatives and a very short 5-7-day shelf life. There had been no complaints related to the nylon pieces so a recall was not initiated, but was discussed.

The root cause of the systems failure was attributed to maintenance's failure to inspect per policy. It was also determined that the task was not assigned but was just understood that one of the 4 maintenance employees would check the sifter once per day.

Take Away Tips:

- Ensure verification of monitoring activities is always undertaken
- Identify foreign material removal devices as process preventive controls to ensure record reviews
- Avoid delegating crucial food safety tasks to maintenance without verification in place
- Treat every incident of foreign material contamination is a unique priority, even if identical to previous concerns.

Submitted by: Rich Gibson, ACE, CHA