

International Commission on Microbiological Specifications for Foods (ICMSF)

www.icmsf.org

Importance of sampling and testing for verification of food safety management system performance

Peter McClure, Consultant,
Member of ICMSF, United Kingdom



Validation, Monitoring & Verification (CAC 2008)

Validation

Obtaining evidence that a control measure or combination of control measures, if properly implemented, is capable of controlling the hazard to a specified outcome.

Monitoring

The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a control measure is under control.

Verification

The application of methods, procedures, tests and other evaluations, in addition to monitoring to determine whether a control measure is or has been operating as intended

Microbiological testing: Limited value for Monitoring

- "...due to the time required for most microbiological analyses and the relative insensitivity of even the most stringent sampling plans, microbiological testing is of limited value for monitoring in quality and safety assurance programs."
 - From ICMSF 201X Microorganisms in Foods 7: Microbiological Testing in Food Safety Management, 2nd edition, Chapter 13



Microbiological testing for Validation and Verification

- Despite limitations related to sensitivity and time to results, microbiological testing can play an important role in
 - validation and verification
 - of process control.



Controlled Food Operations require...

Validation considerations

- 1. Knowledge of the significant hazards
- 2. Knowledge of the factors that are necessary for control
- 3. Knowledge of the extent of variability and factors that influence variability
- 4. Establishing criteria for the factors that must be controlled

Verification considerations

- 1. Establishing monitoring and verification procedures
- 2. Organizing and interpreting data
- 3. Using the data to measure change and improve control
- 4. Responding to the data
- 5. Learnings from Investigations

Validation of Processing Equipment

Equipment validation can be performed by two means:

Validation using surrogate microorganisms

Validation of processing parameters in relation to established control measure



Validation using surrogate microorganisms

- ☐ Ensure that surrogate behaves (minimum) like target microorganism at processing conditions
- Ensure that surrogate organisms do not introduce a risk
- Ensure that product characteristics are not changed despite of inoculation procedure
- Ensure to run equipment under most critical conditions
- Consider variability of method of detection



Validation using surrogate microorganisms

Advantages

- Direct reading of lethal step effectiveness (log-reductions achieved)
- Validation data based on inoculated material

Disadvantages

- Requires microbiological laboratory / external services
- Heat resistance of the organism has to be confirmed for each trial
- Requires possibility to confine inoculated material
- Valid for the tested equipment only



Validation of processing parameters

■ Ensure that critical parameters established by scientific studies are applicable for the process Evaluate process variability with respect to critical parameters, e.g. unevenness of roasting In case of major differences review whole process with engineering & adapt parameters Ensure to run equipment under most critical conditions Ensure that critical parameters are being monitored in the product / material being processed Record / relate to material characteristics, e.g. ingoing temperature, moisture before / after processing Consider tolerance of measuring devices used at treatment conditions

Validation of processing parameters

Advantages

- No microbiological laboratory required
- Immediate result readings / discussions
- Easier to perform / repeat

Disadvantages

- Validity depends on scientific basis used
- Equipment needs to be accessible for the validation equipment used



Potential Verification Activities

- Calibration of equipment
- Review of records
- Targeted sampling and testing
- Visual inspection of equipment
- Environmental monitoring
- **❖** 2nd and 3rd party audits



Targeted Sampling/Testing

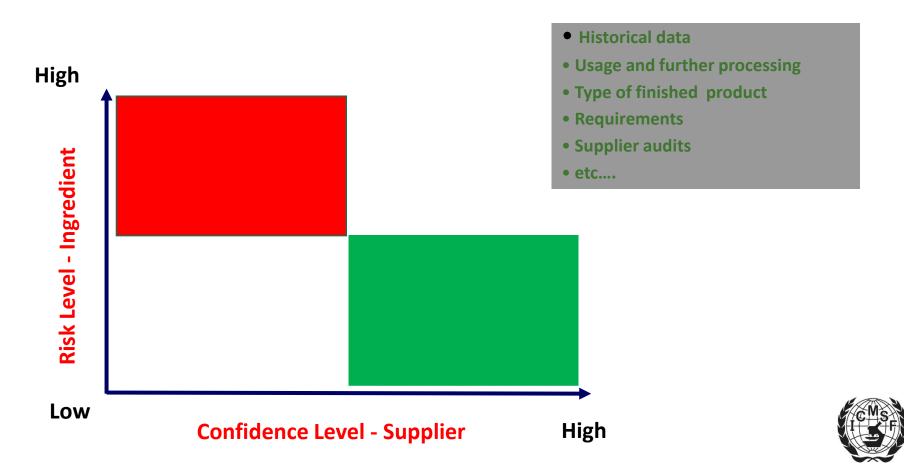
- Verification For Process Control

For process control, periodic verification may include targeted sampling and microbiological testing of:

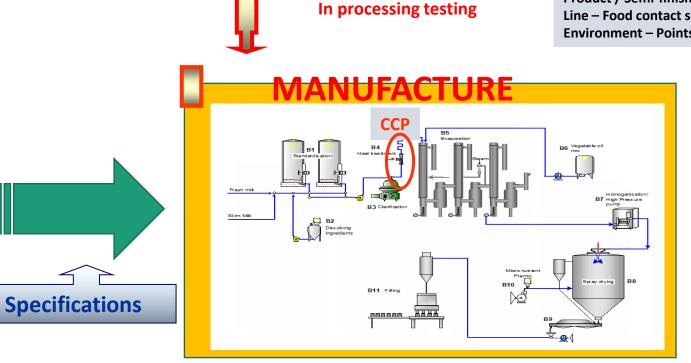
- **!** Ingredients
- In-process materials
- Finished products



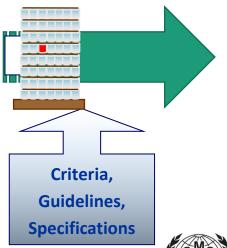
Microbiological Testing - Ingredients



Microbiological Testing - In-Process Material/FP



Product / Semi-finished product
Line - Food contact surfaces including residues
Environment - Points close to/remote from line



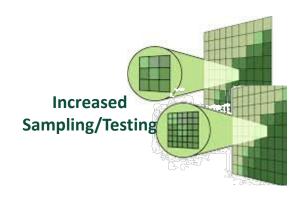
Process Control Verification–Examples – ICMSF BK 8

Relative importance		Useful testing								
	High	Testing for Enterobacteriaceae is recommended to verify process control								
				Sampling plan & limits/g						
		Microorganism	Method	Case	n	С	m	М		
nct		Enterobacteriaceae	ISO 21528-2	2	5	2	10	10 ²		
End product	Low	Testing for pathogens is not recommended during normal operation when GHP and HACCP are effective as confirmed by above tests. When above testing or process deviations indicate a possible safety issue, testing for Salmonella is recommended.								
				Sampling plan & limits/25g						
		Microorganism	Method	Case	n	С	m	М		
		Salmonella	ISO 6579	11	10	0	0	-		

Relative importance		Useful testing	*ICMSF 2011. Microorganism in Foods 8: Use of Data for Assessing Process Control and Product Acceptance.				
In-	High	Test appropriate product residues a	product residues and in-line samples for <i>Salmonella</i> . Typical guidance levels:				
process	High	Salmonella – absent					

Microbiological Testing: Environmental control verification...

- Used to VERIFY Hygiene, PRPs, GMP
- Indication of Process cross contamination
- **Enables Factory to take actions in** response to findings





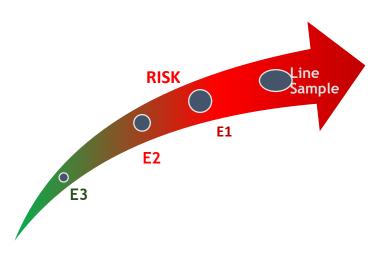
Equipment Dismantling, **Raw material Specs**





Key Aspects of EM programme...

■ Where to Sample...



Zone 1

Product contact surfaces

E.g., conveyors, tables, racks, vats and tanks, utensils, pumps, valves, slicers, dicers, freezers, filling and packaging machines

Zone 2

Non-product contact surfaces in close proximity to product E.g., exterior of equipment, refrigeration units, close floors

Zone 3

Non-product contact surfaces more distant from product but in processing area

E.g., forklifts, floors and walls, telephones, drains

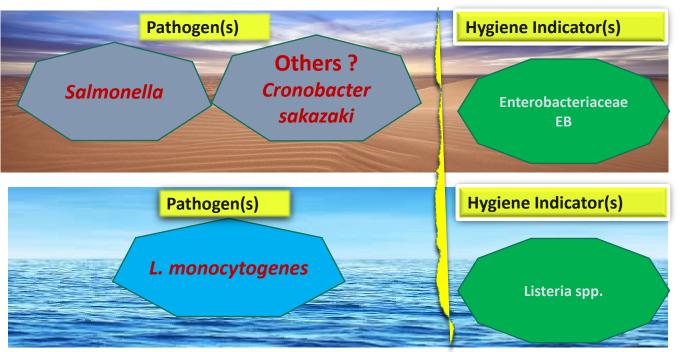
Zone 4

Outside processing area E.g., locker rooms, cafeteria, hallways



Key Aspects of Env Control Testing..

■ What Microorganisms to sample for...





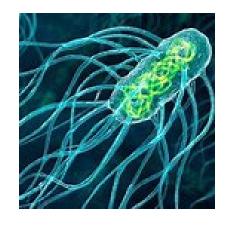


Sampling and Testing

Which parameters should be tested?

Salmonella

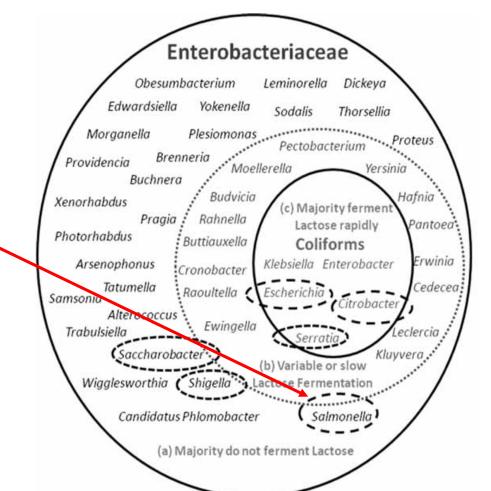
Enterobacteriaceae





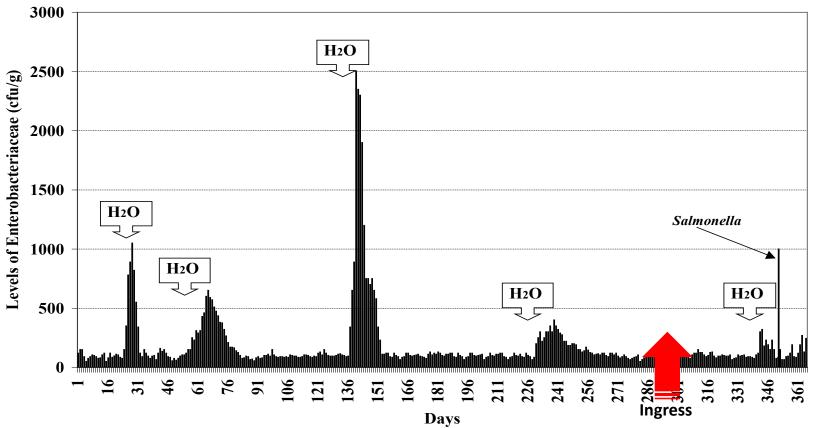
Sampling and Testing

Salmonella is a member of the Enterobacteriaceae





Enterobacteriaceae as Hygiene Indicator





Enterobacteriaceae as a Hygiene Indicator

Enterobacteriaceae ≠ Salmonella

i.e. if you don't find Enterobacteriaceae, does not mean
Salmonella is not present
But
If you do find Enterobacteriaceae, then it is more likely

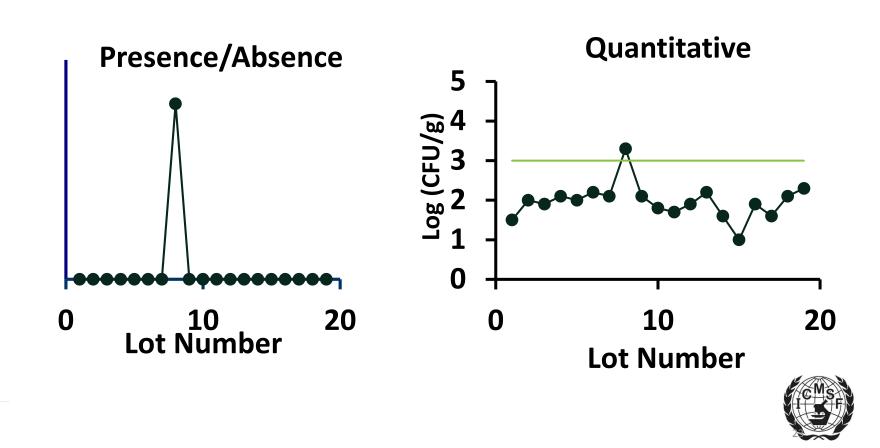
If you do find Enterobacteriaceae, then it is more likely that Salmonella may be present

Rapid, Quantitative and Cheap

'Reactive" and "Operational"

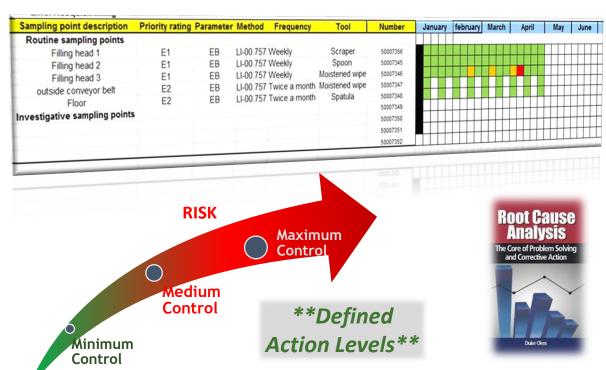


Test Method Influences Information



Key Aspects of EM programme...

■ Data (EM) Management, Trend Spotting & Response

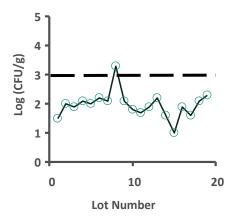


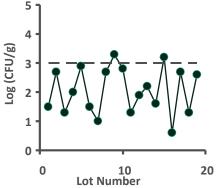


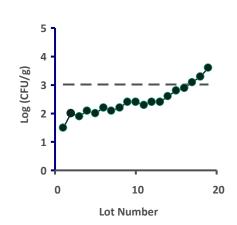


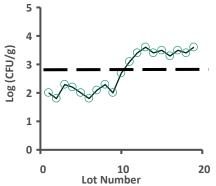


Trend Analysis from Microbiological Testing











Testing methods are not always perfect....

- Sensitivity and Specificity are key parameters
- Use of 'Official Methods'
- Proper Validation of Alternatives
- Proper assessment of Method Performance proficiency Testing
- Accreditation of method performing Laboratories



Key Messages....

- Microbiological testing occurs at numerous points in the food chain
- Finished product testing alone does not assure food safety
- Microbiological testing plays a key role in Verification and Validation
- Verification testing for process control across lots for ingredients, semifinished & finished product is industry practice
- Environmental control (microbiological) testing is a key parameter in industry
 Food Safety Management System
- Method selection, application and performance an element not to be ignored!

