

| an Salad | | PAGE 1 of 19 |
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| | ISSUE DATE | 02/24/2016 |
| | SUPERSEDES | 10/22/2015 |

Selected Sections of a

Food Safety Plan for Broccoli, Carrot, Pecan Salad

Teaching Example

Reviewed by: Plant Manager Date:

The information in this example is for training purposes only and does not represent any specific operation. Many processing steps were omitted or combined to facilitate its use for class exercises. Thus **it is not complete and contains both required and optional information.** Because development of a Food Safety Plan is site specific, it is highly unlikely that this plan can be used in a specific facility without significant modification. Conditions and specifications used (e.g., validation information) are for illustrative purposes only and may not represent actual process conditions.



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Company Overview

This company's ~50 employees produce a variety of refrigerated salads, including:

- Broccoli, Carrot and Pecan Salad;
- Broccoli, Carrot and Raisin Salad; and
- Italian Vegetable Salad with Parmesan Cheese.

Product is produced 5 days a week, with one 9 hour production shift, followed by 4 hours for sanitation. Cleaning and sanitizing of all processing equipment is conducted per a master sanitation schedule, which also includes cleaning and sanitizing between production runs. Municipal water, which is treated and tested per EPA requirements by the city, is used throughout the facility.

This Food Safety Plan covers production of Broccoli, Carrot and Pecan Salad. Other products have separate Food Safety Plans.

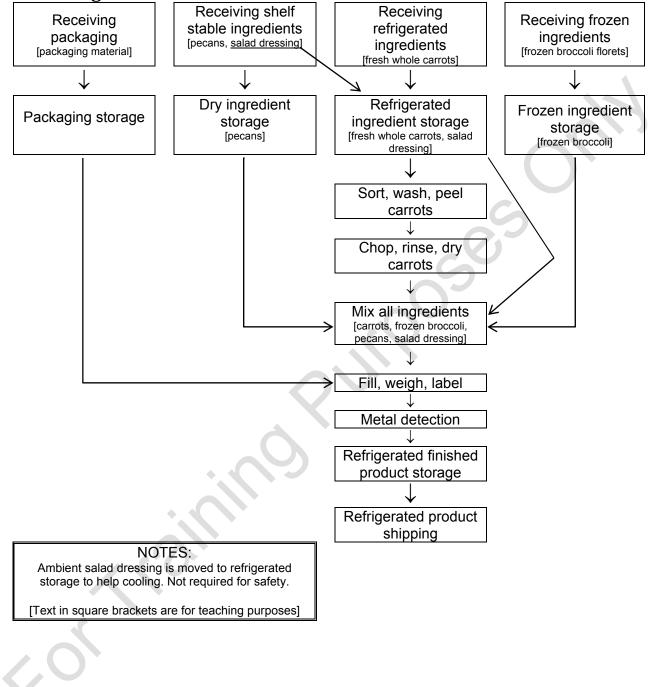
| r rouuee Deberrption | | | |
|--|---|--|--|
| Product Name(s) | Broccoli, Carrot and Pecan Salad | | |
| Product Description, including Important Food Safety Characteristics | Refrigerated, ready-to-eat salad, containing broccoli, carrots, pecans and salad dressing. pH <4.6, | | |
| | water activity >0.95 | | |
| Ingredients | Fresh carrots, frozen (IQF) broccoli, and salad dressing (water, soybean oil, high fructose corn syrup, vinegar, cornstarch, eggs, salt, potassium sorbate, spice, dried garlic) | | |
| Packaging Used | 8 oz. plastic cup and snap on lid | | |
| Intended Use | Ready-to-eat salad, appropriate for grab-and-go applications. Sold through grocery stores, delis and convenience stores. | | |
| Intended Consumers | General public | | |
| Shelf Life | 10 days after manufacture | | |
| Labeling Instructions | Keep refrigerated. | | |
| Storage and Distribution | Refrigerated (≤40°F) storage and distribution | | |
| Approved: | Date: | | |
| Signature: 7. S. Leader | 6 January 2016 | | |
| Print name: F.S. Leader | | | |

Product Description

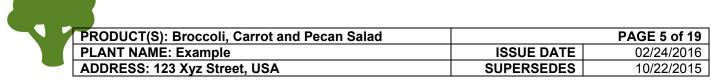


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Flow Diagram







Process Narrative

Receiving packaging

Pre-labeled, 8 oz. flexible plastic cups with snap on lids are received in bulk. Specifications require food grade material compatible for refrigerated food products. Packaging materials are stored separate from ingredients, cleaning chemicals, etc.

Receiving shelf stable ingredients

Pecans: Bag-in-box roasted pecans are received from our sole source broker that offers products only from suppliers complying with internationally recognized food safety and quality schemes. The supplier provides a certificate of analysis for aflatoxin tests to verify compliance.

Salad dressing: Received as a shelf stable product in plastic containers from our sole source broker. This ingredient contains egg which is an allergen and has a pH <4.6.

Receiving refrigerated ingredients

Fresh, topped carrots are received in totes from approved vendors/ growers who meet company food safety and quality requirements. A Letter of Guarantee states that carrots are grown under conditions that minimize contamination with vegetative pathogens and lead, and comply with appropriate regulatory pesticide limits. All carrots are produced in the U.S.

Receiving frozen ingredients

Frozen, blanched individually quick frozen (IQF) broccoli florets are received from our sole source broker. The broker's Letter of Guarantee states that production processes and Good Agricultural Practices for growing the broccoli are used. The product is imported.

Packaging storage

Cups and lids are stored in the dry storage room in the packaging area, arranged by product code to avoid mixing of packaging. Packaging is used First-In-First-Out and partially used shipping containers are closed during storage.

Dry ingredient storage

Pecans are stored in the dry ambient storage room in the ingredient area, arranged by ingredient code number. Because pecans are a food allergen, containers are sealed and stored in a specific location to avoid cross-contact.

Refrigerated ingredient storage

Carrots are stored in a segregated refrigerated storage away from other refrigerated ingredients because they are raw and unwashed. They are used on a First-In-First-Out basis.

Salad dressing is refrigerated (\leq 40°F) upon receipt. Refrigeration is not necessary for safety, but pre-chilling to \leq 40°F aids in cooling the final product.

Frozen ingredient storage

After receipt, frozen broccoli florets are immediately taken to the frozen storage area and used on a First-In-First-Out basis.

Sort, wash, peel carrots

On an as-needed basis, carrots are sorted by hand to remove gross soil, rot, small or large carrots that do not meet product specification and foreign material. Defects are collected, analyzed and trended. Relevant results are reported back to the broker/ grower. Sorted carrots are mechanically washed to remove dirt and debris in antimicrobial treated water, currently



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maintained at no less than 50 ppm free chlorine using a product labeled for washing and peeling fruits and vegetables. Approved¹ chemicals are used according to label instructions. Chlorine levels in the wash water are monitored. Visual inspection verifies absence of foreign material that could result in injury. Carrots are peeled with mechanical peeling equipment with antimicrobial treated water (>50 ppm free chlorine). Care is taken to ensure that peeling equipment is intact before and after each shift or batch.

Chop, rinse, dry carrots

The washed and peeled carrots are transferred to the vegetable preparation room where they are mechanically chopped using a commercial knife blade vegetable chopper to a ¼ inch dice. Chopping blades are checked to ensure they are intact before and after each shift. Once chopped, the carrots are rinsed with single pass water and spin-dried to prevent the carrot juice from bleeding throughout the finished product. Diced carrots are then held at production room temperatures (45-50°F) for no longer than 2 hours.

Mix all ingredients

Chopped carrots, frozen broccoli florets, pecans and salad dressing are mixed using a ribbon blender to gently blend to a uniform mixture. The finished salad is transferred manually with scoops to totes, covered and transported to the filling area. A batch is blended in <15 minutes. The blended product temperature is typically $\leq 40^{\circ}$ F after mixing. Mixed product can be stored in covered totes at $\leq 40^{\circ}$ F for no longer than 24 hours before filling into final package. All work-in-process (WIP) product is labeled with the appropriate product and allergen labeling, as well as the date and time the product was filled into the tote.

Fill, weigh, label

Labels are matched to the specific description and product number as listed on the Daily Production Schedule. 8 oz. pre-labeled cups that contain the pecan and egg allergen statement are manually filled and weighed, and lids are applied to each container. Product pull date (10 days after production) is printed on each cup. The temperature of filled product is measured periodically.

Metal detection

Packaged product is passed through a metal detector and then is transferred to refrigerated storage (≤40°F)

Refrigerated finished product storage

Finished product is stored under refrigeration (≤40°F) until distributed.

Refrigerated product shipping

Product is shipped in refrigerated trucks to customers (convenience stores, office cafeterias, quick serve restaurants and grocery stores) under refrigerated conditions (≤40°F).



¹ "Approved" refers to meeting regulatory requirements, such as EPA registration or FDA listing of chemical used.

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Hazard Analysis

Hazard identification (column 2) considers those that may be present in the food because the hazard occurs naturally, the hazard may be unintentionally introduced, or the hazard may be intentionally introduced for economic gain.

- B = Biological hazards including bacteria, viruses, parasites, and environmental pathogens
- C = Chemical hazards, including radiological hazards, food allergens, substances such as pesticides and drug residues, natural toxins, decomposition, and unapproved food or color additives
- P = Physical hazards include potentially harmful extraneous matter that may cause choking, injury or other adverse health effects

| | ier | adverse nealth e | | | | | | | |
|--------------|-----|---------------------------------------|-------|--------|------------------------------------|-------------------------------|--------|---------|--|
| (1) | | (2) | • | 3) | (4) | (5) | (€ | | |
| Ingredient/ | ld | lentify <u>potential</u> food | | any | Justify your decision for column 3 | What preventive control | | | |
| Processing | | safety hazards | | ntial | | | | | |
| Step | | troduced, controlled | | | | significantly minimize or | | control | |
| | | or enhanced at this | | ards | | prevent the food safety | appli | | |
| | | step | requ | iire a | | hazard? | this s | tep | |
| | | | preve | entive | | Process including CCPs, | | | |
| | | | cont | trol? | | Allergen, Sanitation, Supply- | | | |
| | | | Yes | No | | chain, other preventive | Yes | No | |
| | | | | | | control | | | |
| Receiving | | None | | | | | | | |
| packaging | С | None | | | | | | | |
| | Ρ | None | | | | | | | |
| Receiving | | Vegetative | Х | | Raw tree nuts have a | Supply-chain Control – | Х | | |
| shelf stable | | pathogens such | | | history of potential | Salmonella is controlled | | | |
| ingredients | | as Salmonella | | | contamination with | by the supplier through | | | |
| – pecans | | | | | vegetative pathogens | the roasting process | | | |
| roound | С | Allergen – | Х | | Pecans are tree nuts, | Allergen Control - | | Х | |
| | ľ | pecan tree nut | ~ | | which could present a | allergen cross-contact | | | |
| | | | | | source of cross-contact for | prevention and allergen | | | |
| | | | | | other products that do not | labeling at subsequent | | | |
| | | | | | contain pecans. | steps | | | |
| | | Aflatavia | V | | | | V | | |
| | | Aflatoxin | X | | Pecans have a history of | Supply-chain Control – | Х | | |
| | | | | | potential contamination | Aflatoxin is controlled by | | | |
| | | | | | with aflatoxin | the supplier by removal | | | |
| | | <i>▶</i> | | | | of moldy, discolored | | | |
| | | | | | | pecans | | | |
| | | None | | | | | | | |
| Receiving | В | None | | | Industrially produced, shelf- | | | | |
| shelf stable | | | | | stable salad dressing has a | | | | |
| ingredients | | | | | high acid content that | | | | |
| – salad | | | | | destroys vegetative | | | | |
| dressing | | · · · · · · · · · · · · · · · · · · · | | | pathogens | | | | |
| 5 | С | Allergen – egg | Х | | Egg is an allergen, which | Allergen Control - cross- | | Х | |
| | | | | | could present a source of | contact prevention and | | `` | |
| | Ĩ | | | | cross-contact for other | allergen labeling at | | | |
| | | | | | products that do not | subsequent steps | | | |
| | | | | | contain egg. | | | | |
| | D | None | | | contain egg. | | | - | |
| | ľ | NOTE | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| continued | | | | | | | | | |

continued



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| (1) | | (2) | (3 | 3) | (4) | (5) | (6 | 5) | |
|-------------|----|------------------------------|--------|--------|------------------------------------|---------------------------------|--------|-----------------------|--|
| Ingredient/ | Id | entify <u>potential</u> food | Do | any | Justify your decision for column 3 | What preventive control | ls t | he | |
| Processing | | safety hazards | pote | | | measure(s) can be applied to | preve | ntive | |
| Step | in | troduced, controlled | food s | safety | | significantly minimize or | cont | trol | |
| | | or enhanced at this | haza | ards | | prevent the food safety | applie | applied at this step? | |
| | | step | requ | ire a | | hazard? | this s | | |
| | | | preve | entive | | Process including CCPs, | | 4 | |
| | | | cont | rol? | | Allergen, Sanitation, Supply- | | | |
| | | | Yes | No | | chain, other preventive | Yes | No | |
| | | | | | | control | | | |
| Receiving- | В | Vegetative | Х | | Raw vegetables and soil | Supply-chain Control - | | Х | |
| fresh whole | | pathogens such | | | may contain pathogens that | Production in | | | |
| carrots | | as Salmonella | | | can transfer through further | accordance with the | | | |
| | | and pathogenic | | | | Produce Safety rule | | | |
| | | E. coli | | | | minimizes vegetative | | | |
| | | 2. 00 | | | conditions. Intact carrots do | | | | |
| | | | | | not support pathogen | Subsequent process | | | |
| | | | | | growth. | <i>controls</i> – antimicrobial | | | |
| | | | | | growth. | washing & peeling, short | | | |
| | | | | | | post-chop process time, | | | |
| | | | | | | | | | |
| | | | | V | | finished product temp. | | | |
| | | Sporeforming | | Х | While raw vegetables may | | | | |
| | | pathogens - C. | | | contain C. botulinum, it will | | | | |
| | | botulinum | | | not grow or produce toxin | | | | |
| | | | | | on intact carrots or later | | | | |
| | | | | | due to aerobic conditions | | | | |
| | | | | | and competitive | | | | |
| | | | | | microorganisms inherent to | | | | |
| | | | | | the process. | | | | |
| | С | Pesticides | | Х | Ingredient is US-sourced. | | | | |
| | | | | | FDA data rarely show | | | | |
| | | | | | pesticide residues above | | | | |
| | | 4 | | | EPA tolerance levels or | | | | |
| | | | | | unapproved pesticides | | | | |
| | | Lead | X | . · | Lead can occur when | Supply-chain Control - | | Х | |
| | | | | - | carrots are grown in a | site selection addressed | | | |
| | | | | | 5 | in specifications | | | |
| | | | | | lead arsenate pesticide | | | | |
| | Р | None | | - | | | | | |
| Receiving | B | Vegetative | Х | | Bacterial pathogens may | Supply-chain Control - | | х | |
| frozen, | ľ | pathogens such | | | occur on raw produce and | Blanching and | | | |
| blanched | 1 | as Listeria | | | | environmental sanitation | | | |
| broccoli | | monocytogenes | | | | controls | | | |
| florets | | and Salmonella | | | sanitation controls. | | | | |
| norets | C | Pesticides | Х | | | Supply chain Control | | Х | |
| | | resucides | ^ | | FDA testing periodically | Supply-chain Control - | | ^ | |
| | 1 | | | | | Pesticide control and | | | |
| | | | | | | monitoring for broccoli | | | |
| | | | | | • | from countries without | | | |
| | | | | | certain countries. ² | robust control programs | | | |
| | Ρ | None | | | | | | | |

² FDA data suggests periodic detection of unapproved residues or levels above tolerance in imported produce from certain countries. If sourced from US or other country with evidence that pesticide non-compliance is rare, column 3 can be answered "No". See carrot example.



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| (1) | | (2) | (3 | 3) | (4) | (5) | (6 | 5) |
|--------------|----|------------------------------|--------|--------|------------------------------------|-------------------------------|--------|-------|
| Ingredient/ | Id | entify <u>potential</u> food | Do | any | Justify your decision for column 3 | What preventive control | ls t | he |
| Processing | | safety hazards | pote | ntial | | measure(s) can be applied to | preve | ntive |
| Step | in | troduced, controlled | food s | safety | | significantly minimize or | con | trol |
| | | or enhanced at this | haza | ards | | prevent the food safety | appli | ed at |
| | | step | requ | ire a | | hazard? | this s | tep? |
| | | | preve | | | Process including CCPs, | | ÷ |
| | | | cont | rol? | | Allergen, Sanitation, Supply- | | |
| | | | Yes | No | | chain, other preventive | Yes | No |
| | | | | | | control | | |
| Storage – | | None | | | | | | |
| Packaging | С | Allergen cross- | | Х | Only unopened or resealed | | | |
| and dry | | contact during | | | containers of allergenic | | | |
| ingredients | | storage | | | ingredients are stored in | | | |
| [pecans] | | | | | the dry storage area | | | |
| []=====] | | | | | making cross-contact | Co | | |
| | | | | | unlikely. | | | |
| | Ρ | None | | | | | | |
| Refrigerated | | None | | | These refrigerated | | | |
| ingredient | | | | | ingredients do not support | 5 | | |
| storage | | | | | pathogen growth. | | | |
| [fresh | С | Allergen cross- | | Х | Only closed containers of | | | |
| carrots. | ľ | contact during | | Λ | allergenic ingredients are | | | |
| salad | | | | | | | | |
| | _ | storage | | | stored in this storage area | | | |
| dressing] | | None | | | | | | |
| Frozen | в | None | | | Pathogen growth does not | | | |
| ingredient | | | | | occur in frozen storage | | | |
| storage | | None | | | | | | |
| [blanched | Ρ | None | | | | | | |
| broccoli] | _ | | | | | | | |
| Sort, wash, | в | Vegetative | Х | | Wash water may spread | Process Control – | Х | |
| peel carrots | | pathogens such | | | contamination, if present, to | · · · · · · | | |
| | | as Salmonella, 🥤 | | | all carrots. Growth is not | in wash water | | |
| | | STEC | | | likely with short process | | | |
| | | | | | time. | | | |
| | | None | | | | | | |
| | Ρ | Metal | X | | Metal on metal wear in | Metal detection at a | | Х |
| | L | | | | peeling equipment | later step | | |
| Chop, rinse, | В | Environmental | Х | | Environmental | Sanitation Control – | Х | |
| dry carrots | | pathogens such | | | contamination | zoning and | | |
| , | ſ | as Listeria | | | | environmental sanitation | | |
| | | monocytogenes | | | | | | |
| | С | None | | | | | 1 | 1 |
| | _ | Metal | Х | | The potential for metal | Metal detection at a | 1 | Х |
| | | | | | contamination from | later step | | |
| | | | | | chopper exists; fragments | | | |
| | | | | | could result in injury. | | | |
| continued | L | | | | could result in injury. | | | L |

continued



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| (1) | | (2) | (3 | 3) | (4) | (5) | (6 | 5) |
|--------------|----|------------------------------|------|--------|------------------------------------|-------------------------------|--------|------|
| | Id | entify <u>potential</u> food | Do | | Justify your decision for column 3 | What preventive control | ls t | - |
| Processing | | safety hazards | | ntial | | measure(s) can be applied to | | |
| Step | | troduced, controlled | | | | significantly minimize or | con | |
| | • | or enhanced at this | | ards | | prevent the food safety | applie | |
| | | step | • | ire a | | hazard? | this s | tep? |
| | | | | entive | | Process including CCPs, | | |
| | | | cont | | | Allergen, Sanitation, Supply- | | |
| | | | Yes | No | | chain, other preventive | Yes | No |
| Mix all | Р | Environmental | Х | | Decentemination may | control Sanitation Control – | | x |
| | Р | | ^ | | Recontamination may | | | ^ |
| ingredients | | pathogens such | | | occur if environmental | zoning and | | |
| [carrots, | | as L. | | | control is not in place. | environmental sanitation | | |
| frozen | | monocytogenes | | | Process time is too short | | | |
| broccoli, | _ | | | | for growth to occur. | | | |
| | С | Allergens from | Х | | This product could be | Allergen Control and | Х | |
| salad | | other products; | | | exposed to milk allergen | Sanitation Control – | | |
| dressing] | | e.g., Italian | | | from other products if not | prevent allergen cross- | | |
| | | Vegetable Salad | | | controlled | contact | | |
| | _ | None | | | | S | | |
| | В | Vegetative and | | Х | Short process time - | | | |
| label | | sporeforming | | | pathogens unlikely to grow | 2 | | |
| | | pathogen | | | | | | |
| | | growth | | | <u>.</u> | | | |
| | | Product | Х | | Recontamination may | Sanitation Control – | Х | |
| | | recontamination | | | occur if equipment cleaning | | | |
| | | with | | | and employee practices are | | | |
| | | environmental | | | not proper | | | |
| | | pathogens such | | | not propor | | | |
| | | as L. mono | | | | | | |
| · | C | Undeclared | Х | | Product contains egg and | Allergen Control – | Х | |
| | | allergens – egg, | ~ | | pecan allergens | declaration on label | ^ | |
| | | | | | pecan allergens | | | |
| | р | pecan None | | | | | | |
| | _ | | | | | | | |
| | _ | None | | ~ | | | | |
| | | None | | | | | | |
| | Р | Metal | X | | Chopping carrots and other | | Х | |
| | | | | | metal-on-metal contact | detection | | |
| | | | | | may periodically produce | | | |
| - | | | | | metal hazards | _ | | |
| | В | Vegetative and | Х | | Pathogens can grow if | Process Control – | Х | |
| finished | | sporeforming | | | product is time and | product storage | | |
| product | | pathogen | | | temperature abused | temperature prior to | | |
| storage | | growth | | | | shipment | | |
| | С | None | | | | | | |
| | Ρ | None | | | | | | |
| | В | Vegetative and | Х | | Pathogens can grow if | Process Control – | Х | |
| Refrigerated | | sporeforming | | | product is time and | product and shipping | | |
| | | | | | • | | 1 | 1 |
| product | | | | | Itemperature abused | vehicle temperature | | |
| U | | pathogen | | | temperature abused | vehicle temperature | | |
| product | C | | | | temperature abused | vehicle temperature | | |





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Process Preventive Controls

| Process | . | | | Monitori | ng | Corrective | | Record- | |
|-----------------|---|---|--|---|-------------|------------------|--|---|--|
| Control(s) | Hazard(s) | Critical Limits | What | How | Frequency | Who | Action | Verification | keeping Procedures |
| | Vegetative pathogens such as <i>Salmonella</i> and pathogenic <i>E.</i> <i>coli</i> | Free chlorine in wash water at end of batch run is ≥10 ppm, pH 7.5 maximum | Wash water Initial chlorine level in water is ≥50 ppm | Chlorine and pH test strips match color | Each batch | Wash operator | If chlorine or pH level is not correct, then 1) adjust and conduct training as needed to prevent recurrence 2) segregate carrots to the last good check, reprocess or discard; 3) identify root cause and correct. | Daily review of Wash Water Chlorine log Perform accuracy check on both pH and chlorine strips for each new lot of strips with standard solutions Review of corrective action log Review of verification records | Wash Water log showing both chlorine and pH value: Corrective action records Verification records Validation report that shows chlorine wash water is effective |
| Metal detection | | | Í, | | | | | | |
| | | of pote can va | ential wording | an in curriculum for metal detec on the product c. | tion. Paran | neters | | | |
| | | 0 | L | | 1 | 1 | | | 1 |

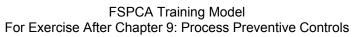




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| Process | | | | Monitori | ng | | Corrective | | Record- |
|---|---|---|--|--------------------------------|--|--|--|--|--|
| Control(s) | Hazard(s) | Critical Limits | What | How | Frequency | Who | Action | Verification | keeping Procedures |
| Refrigerated finished product storage | Vegetative and spore- forming pathogen growth | Cooler maintained at ≤40°F Product temperature ≤40°F | Cooler temperature Product internal temperature when it enters the cooler | a continuous chart recorder | Continuous, with visual check of recorded data once per day First product in and every 2 hours until the end of shift | Production employee Production employee | If cooler temperature is >40°F, place product in alternative cooler. If product temperature is >40°F, measure upstream product and component temperatures to determine potential issues. Hold and evaluate based on total time and temperature exposure - release or reject as appropriate. Find root cause and fix cooler. Retrain if appropriate. | Check recorder and dial thermometer for accuracy and to ensure that they are operating properly before putting into use; check daily at the beginning of operations. Calibrate recorder annually. Calibrate dial thermometer when accuracy check indicates need. Review monitoring, corrective action, and verification records within one week of preparation | Recording refrigeration charts and visual check records Product temperature log Thermometer accuracy checks and calibration records. |

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| Process | | | | Monitori | ng | | Corrective | | Record- |
|-------------------------------------|---|---|---|---|---------------------------------|-------------------|--|--|--|
| Control(s) | Hazard(s) | Critical Limits | What | How | Frequency | Who | Action | Verification | keeping Procedures |
| Refrigerated product shipping | Vegetative and spore- forming pathogen growth | Product and shipping vehicle temperature must be ≤40°F. | Temperature in refrigerated truck | Recording thermometer on truck compared to temperature of our own thermometer. | Every load before loading | Shipping clerk | If truck temperature is >40°F before loading, then 1) close truck and wait until temperature is ≤40°F before loading. 2) identify root cause; 3) conduct training as needed to prevent recurrence | Check thermometer for accuracy daily at the beginning of operations. Calibrate annually. Review monitoring, and associated corrective action, and verification records within one week of preparation | Shipping truck temperature log Thermometer calibration records. |





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Allergen Preventive Controls

| Allergen | | | | Monit | oring | | Corrective | | |
|-----------------------|---|--|--|--|--|--------------------------|--|--|--|
| Controls | Hazard(s) | Criterion | What | How | Frequency | Who | Action | Verification | Records |
| Fill, weigh, label | Undeclared Allergens — pecans and eggs | Correct labels applied to finished product | Label on finished product matches product number and declares pecans and egg | Visual inspection of finished product label | At the beginning and the end of each packaging run, and each new case of containers | Packaging line worker | If label is incorrect, then 1) segregate product, inspect back to the last good check, re-label or discard product; 2) identify root cause; 3) conduct training as needed to prevent recurrence | QA manager reviews Packing Room Log within one week and compares to past information to identify any trends. Weekly review of associated verification records corrective action records, if any | Allergen Label Check log <i>Corrective</i> <i>Action</i> records Verification records |

| Allergen Label Verification Listing | |
|--|-----------------------|
| Products | Allergen Statement |
| Broccoli, Carrot and Pecan Salad | Contains: Pecans, egg |
| Broccoli, Carrot and Raisin Salad | Contains: Egg |
| Italian Vegetable Salad with Parmesan Cheese | Contains: Milk, egg |

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Production Line Allergen Assessment

| | | | Intentional Allergens | | | | | | |
|--|--------------------|-----|-------------------------|-----|-------|-------------------------------------|--------|---------------------------------|--------------------------------------|
| Product Name | Production Line | Egg | Milk | Soy | Wheat | Tree Nut (market name) | Peanut | Fish (market name) | Shellfish (market name) |
| Broccoli, Carrot and Pecan Salad | 1 | Х | | | 05 | Pecan Unique allergen | | | |
| Broccoli, Carrot and Raisin Salad | 1 | Х | | | | | | | |
| Italian Vegetable Salad with Parmesan Cheese | 1 | Х | X Unique allergen | | | | | | |

Scheduling Implications: Broccoli, Carrot and Raisin Salad does not contain allergens present in other products. Standard practice is to run this product first to facilitate change overs.

Allergen Cleaning Implications: A complete allergen clean is required after Broccoli, Carrot and Pecan Salad <u>and</u> Italian Vegetable Salad with Parmesan Cheese to avoid allergen cross-contact.

FSPCA Training Model For Exercise After Chapter 10: Food Allergen Preventive Controls





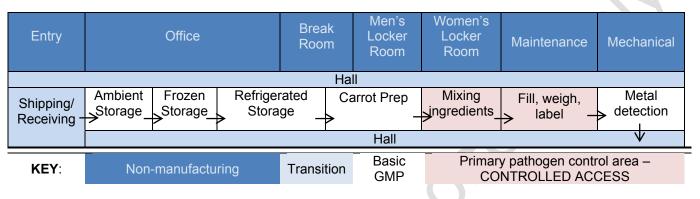
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Sanitation Preventive Controls

NOTE: See Food Safety Plan in curriculum for an example of potential wording for cleaning and sanitation procedures. Parameters can vary depending on the product, equipment, etc.

Hygienic Zoning & Environmental Monitoring

Purpose: Hygienic zoning in is important to minimize the potential of re-contamination with environmental pathogens. Verification is by environmental monitoring (see Environmental Monitoring for Sanitation Preventive Control Verification).



Frequency: During production

Who: Employees and other individuals entering the Mixing and Fill areas (in pink above)

Procedure: Employees entering the Assembly and Fill areas must (in the order listed):

- 1. Take a clean, blue smock from the rack outside the production area and put them on. Smocks must cover outer clothing that would be above the processing line.
- 2. Take blue shoe covers from the box by the entry and put them on over shoes.
- 3. Take a blue hairnet from the box by the entry and put it on. Ensure that all loose hair is captured. Men with facial hair should also apply beard nets.
- 4. Wash hands just before entering the area following the procedures posted by the sink. Apply a clean pair of gloves.
- 5. When exiting the room deposit smocks, shoe covers and hair nets in the receptacles provided. DO NOT reuse disposable items after entering uncontrolled areas.

Maintenance workers and visitors must follow the above when entering this area. Traffic in this area is minimized during production.

Monitoring: For hygienic zoning, the sanitation supervisor visually observes the presence of the properly smocked employees, before start up and after lunch break, and every 2 hours.

Corrections: Employee is instructed to gown properly.

Records: Daily Hygienic Zoning Record, Environmental Monitoring Sampling Record and lab results

Verification: Environmental monitoring for verification of sanitation control and records review within 7 working days





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Environmental Monitoring for Sanitation Preventive Control Verification

- **Purpose**: Environmental monitoring is conducted to verify the effectiveness of sanitation and hygienic zoning procedures in the Mixing and Fill, weigh, label areas to control environmental pathogens such as *L. monocytogenes*.
- **Sample identification:** Based on observation when sampling, "worst case" areas are sampled; e.g., standing water or product residue, around table legs, crevasses major traffic areas. Record the specific location sampled.
- Sampling procedure: Every other week, sponge swabs are collected during production at least 3 hours after production starts. Sampling time is not uniform to avoid bias of results. Samples are shipped to the laboratory using the sampling kit provided by the laboratory. Samples are refrigerated and shipped in an insulated cooler with a gel pack with next day delivery. Samples are NOT frozen.

The following number of samples collected each time.

- 3 in Assembly area
- 3 in Fill, weigh, label area
- 1 in the hallway at the entry of the assembly area
- 3 other samples based on observed conditions
- **Laboratory:** Wee Beasties Laboratory (987 Critter Drive, Yourtown, USA) conducts the analysis using XYZ³ procedures. Analysis is started within 48 hours of sampling.
- **Test conducted:** For routine samples, the contract lab composites sponges from the same area to run as one test for *Listeria* species. *Investigation samples must be run individually.* The test result sheet identifies the specific method number used.

Interpretation of results:

Acton for a negative result – Continue routine operations

Corrective action for a positive result:

- 1. If a composite is positive, the positive areas are re-sampled within a day of notification and prior to implementing intensive sanitation procedures. Additional samples (number depends on size of area) are taken in other potential problem areas in an attempt to identify a site of contamination. All samples are run individually, without compositing.
- 2. Intensive sanitation procedures are implemented after sampling is complete.
- 3. Production can continue after sanitation is complete and product can be shipped.
- 4. If all re-samples are negative, resume the normal sampling frequency.
- 5. If one or more re-samples are positive, perform corrective action investigation to resolve the issue. Implement a hold and finished product testing procedure per the Product Testing for Verification corrective action protocol.

³ XYZ would be a scientifically valid method, such as AOAC, ISO, FDA, etc. The procedure must be validated for compositing (FDA BAM is not as of 10/22/2015)





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Supply-chain Preventive Controls Program

Determination of Verification Procedures - Audits

Verification activities: A 3rd party supplier audit by a qualified auditor is used to verify supply- chain control of the hazards listed in the table below. Additional verification activities may be conducted as identified in the table below.

Verification procedures: A copy of a 3rd party audit is requested from each supplier listed below on an annual basis. The audit date, auditor qualifications, audit procedures and audit results are reviewed. Follow up discussion with the supplier takes place, as necessary, to verify that any corrective actions mentioned in a report have been completed, with records maintained for this activity.

Records: A copy of audit reports and verification of corrective actions taken by the supplier are maintained on file by the Food Safety Team Leader.

| Raw Material or Other Ingredient | Hazard(s) Requiring a Supply-chain- applied Control | Preventive Control Applied by Supplier | Verification Activities | Verification Procedures | Acceptance Criteria |
|---|---|---|---|--|--|
| Pecans | Vegetative pathogens such as <i>Salmonella</i> | The supplier roasts pecans to inactivate vegetative pathogens | 3 rd party audit | See above | See above |
| | Aflatoxin | The supplier sorts pecans to remove damaged nuts and conducts aflatoxin testing (using a valid method listed on their results report) to verify their control procedures. | A certificate of analysis for each lot of shelled pecans is used to verify supplier control. | For each lot received, trained receiving personnel review the supplier certificate of analysis for aflatoxin | < 15 ppb aflatoxin average maximum for sub-samples with no individual reading > 25 ppb |
| Fresh carrots | Vegetative pathogens such as <i>Salmonella</i> and pathogenic <i>E. coli</i> Lead | Produce Safety rule compliance minimizes lead and vegetative pathogens | 3 rd party audit | See above | See above |
| Frozen broccoli | Vegetative pathogens such as <i>L. monocytogenes</i> and Salmonella | Blanching and environmental sanitation controls | 3 rd party audit | See above | See above |
| | Pesticides (for product sourced from countries without robust control programs) | Pesticide control and monitoring | Sampled and sent for pesticide screen, quarterly | Quality technician takes and submits samples per procedure XYZ. Quality manager verifies that results comply with acceptance criteria | Residues comply with regulatory requirements following procedure XYZ |

Other Verification Procedures





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Approved Suppliers for Ingredients Requiring a Supply-chain-applied Control

| Ingredient (requiring supply-chain- applied control) | Approved Supplier | Date of Approval | Hazard(s) requiring supply- chain-applied control | Verification method | Verification records |
|---|--|---------------------|---|---|--|
| Pecans | Nuts2U Co., Cropville, USA | 10/22/2013 | Salmonella | Copy of 3 rd party audit by a qualified auditor obtained from supplier to verify <i>Salmonella</i> control | Copy of audit kept in Supplier Verification File |
| | | | Aflatoxin | Supplier's Certificate of Analysis (COA) with each shipment to verify aflatoxin control | COA and incoming goods log, corrective records |
| Fresh carrots | WeeGrower Inc., Rabbiton, USA | 9/15/2011 | Vegetative pathogens such as Salmonella and pathogenic <i>E. coli</i> | Copy of 3 rd party audit by a qualified auditor obtained from supplier | Copy of audit kept in Supplier Verification File |
| Frozen broccoli | FreezRFood, Bordertown, NotUSA | 8/8/2012 | Vegetative pathogens such as L. monocytogenes and Salmonella | Copy of 3 rd party audit by a qualified auditor obtained from supplier | Copy of audit kept in Supplier Verification File |
| | | | Pesticides (for product sourced from countries without robust control programs) | Internal sample and test | Lab test results kept in supplier file |

Receiving procedures: For each shipment received, the receiving clerk uses the receiving database to identify required documentation then:

- verifies that the product is from an approved supplier
- verifies that each lot in the shipment is accompanied by a COA, if appropriate
- reviews each COA against acceptance criteria above, as appropriate
 - documents the above in the Incoming Goods Log.

