



American Spice Trade Association

Setting the Stage

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Farm to Fork Traceability – Why?

- Supply Chain Traceability
 - Within the scope of the supplier management system, direct linkages from finished goods BOM & process, to material specification, to broker, to supplier company/facilities' process control steps. Processor's traceability to source of supply and control.
 - Who controls Food Safety? Customer?

Farm to Fork Traceability – Why?

- Monitoring of Global Detention Websites, Literature or Daily Notifications
 - Europe Union - RASFF
 - Japan website
 - FDA Import Alert website
 - Food Track Incident Alert
- Existing and New Supplier Due Diligence
- Forecasting of Second/Third Wave Recalls: first is the tremor, then the earthquake, finally the tsunami

Farm to Fork Traceability – Why?

- Risk Visibility
 - Continuation of Colorant issues in Europe
 - Increases in detentions for mycotoxins
 - Increased Salmonella recalls in associated low Aw materials: Pathogen Survival and Contamination during processing and storage
 - Lack of appropriate Food Safety Risk Assessments
 - Pesticide and Heavy Metal risk due to agricultural practices – literature reviews

Farm to Fork Traceability – Why?

- Global Detention Websites, Articles or Daily Notifications
 - Examples from January 2010
 - 1/23/10 RTE Salami 1.2 million pounds due to Salmonella (Black Pepper)
 - 1/22/10 Curry Leaves due to Triazophos from India.
 - 1/19/10 Heavy Metal Contamination of Foodstuffs in Jaipur: Coriander Cd, Cr, and Pb; highest level of survey items
 - 1/12/10 Ground Chili Peppers due to Rhodamine B and Orange II from Ireland
 - 1/6/10 Paprika and Tandoori due to Sudan I from India
 - 1/5/10 Ground Chilies due to Aflatoxin B1 from India
 - 9/8/09 Seasoning Rubs due to Salmonella (Red Pepper)
 - 8/1/09 Red Pepper due to Salmonella – Texas
 - 4/16/09 Multiple Spices due to Salmonella - California

Farm to Fork Traceability – Why?

- Almonds
- Peanuts
- Seeds
- Black/Red Pepper

–HVP

- Flour?

Farm to Fork Traceability – Why?

- Risk Assessment – Ingredients
 - Pathogens, primary Salmonella
 - Toxins, primary Aflatoxin and Ochratoxin A
 - Pesticides
 - Heavy Metals
 - Colorant Contamination
 - Adulteration
 - Foreign Material

Farm to Fork Traceability – Why?

- Risk Assessment – Ingredients
 - Define requirements within Specifications
 - Define expectations within Policies, Standards and Procedures
 - Agreements for Compliance
 - Certificate of Analysis
 - Appropriate Validation Testing of materials: Reporting of Food Safety Hazards to FDA
 - Ingredients appropriate for Finished Goods to be manufactured?
 - Do you know how your ingredients are being used by your customer?

Farm to Fork Traceability – Why?

- Who is the processor and are they capable?
 - Pathogen CCP, where and what?
 - Environmental Controls post Pathogen CCP
 - Chemical & FM CCPs – awareness of risk
 - Adequate Storage Controls
 - Testing and Sampling Capabilities
 - Quality Systems and Good Manufacturing Practices
 - Supplier Approval and Control Programs

Farm to Fork Traceability – Why?

- Supplier Assessments
 - Appropriate for ingredients produced and finished goods that are to be manufactured.
 - Questionnaires
 - Evidence Documents – no guarantee letters or certificates
 - Internet Risk Assessment
 - Second Party Audits
 - Third Party Audits
 - Classification
 - Supply Chain Risk Assessments
 - Heinz Audits

Farm to Fork Traceability – Why?

- Heinz Audit
 - Increased Personnel
 - Spice/Flavor Specific Auditor
 - Knowledge of Industry Issues and Practices
 - Specific Training beyond Quality System, GMP, and HACCP: Environmental Micro Audits - Salmonella
 - Verification of Controls beyond Third Party Audits
 - Knowledge of current ingredient issues - SCARs
 - Specific verification of compliance to Heinz Specifications
 - Knowledge of application

Farm to Fork Traceability – Why?

- Supply Chain
 - Education
 - Drive improvement through audit corrective actions
 - Remove Suppliers from Supply Chain based upon audit, material performance, and external risk notifications
 - Benchmark Suppliers based upon performance
 - Consolidate/Simplify Supply Chain to reduce Risk

Farm to Fork Traceability – Why?

- Supply Chain
 - Leverage Company's Global Knowledge Resources
 - Food Safety Training Modules
 - Global Ingredient Risk Assessment Tool
 - Common Global Approach
 - Shared Audit Resources
 - Global Communication of Issues
 - Common Database for Supply Performance Documentation

Farm to Fork Traceability – Why?

- Governmental and Industry Recommendations
 - IFT report on enhanced food tracing guidelines released by CFSAN – 11/13/09
 - FSIS and FDA public meeting on improving food traceability – 11/05/09
 - Food Protection Trends – Control of Salmonella in Low-Moisture Foods I, II, & III - 2009
 - Government Auditors find Food Trace back program flawed – 12/11/2009
 - GMA Control of Salmonella in Low Moisture Foods – 3/16/09
 - GMA Best Practices Guide for Food Suppliers – 4/16/08

Farm to Fork Traceability – Why?

- Implications
 - Customer injury and death
 - Finance Losses: immediate and future
 - Lawsuits
 - Loss of Finished Goods
 - Recall Expenses
 - Loss of Business
 - Damage to Company's Goodwill, Intrinsic Value

Farm to Fork Traceability – Why?

- **FDA Warns Spice Industry of Stepped Up Scrutiny**

The spice industry can expect increases in sampling and testing of spices coming into the U.S. in the coming months. That is just one area of increased scrutiny detailed by the Food and Drug Administration (FDA) in a meeting with ASTA this week. The Agency requested the meeting to highlight concerns about spices, particularly potential *Salmonella* contamination and to seek the industry's cooperation in working to improve food safety. A dozen FDA officials participated in the meeting, including Dr. Stephen Sundlof, Director of the Center for Food Safety and Applied Nutrition (CFSAN).

- FDA officials outlined other steps they are taking as they intensify their focus on spices:
- Money is being reallocated in this year's budget to allow for inspections of spice processors in several targeted countries overseas. This was budgeted to begin in 2011, but now will start in the next couple of months and continue next year. The countries being targeted were not identified
- The "sampling blitzes" at the border that were experienced in the past few months will continue.
- The FDA is also looking closely at filth in spices.

Risk Assessment Failure

- Relying on historical data or performance – peanut butter
- Focusing on narrow measures – almonds
- Overlooking risks – lack of standards in specifications, lack of elements in audit, lack of traceability, lack of testing
- Overlooking concealed risks – lack of communication of failures to improve processes – Customer Complaints, SCARs, Import Alerts, Listeria findings on a piece of equipment used at several different facilities.
- Communication failures – lack of training/lack of experience, not understanding the importance of findings or observations
- Access to Risk Notification – immediate reaction and risk assessment, further production with non valid processes or adulterated ingredients usage
- Failure to comply with existing risk prevention protocols.
- Unknown emerging risks – toxins, melamine like chemicals? History repeats