





# We want to hear from you! Please type your questions in the chat box.



#### **About TraceGains**

**Together we do more** 

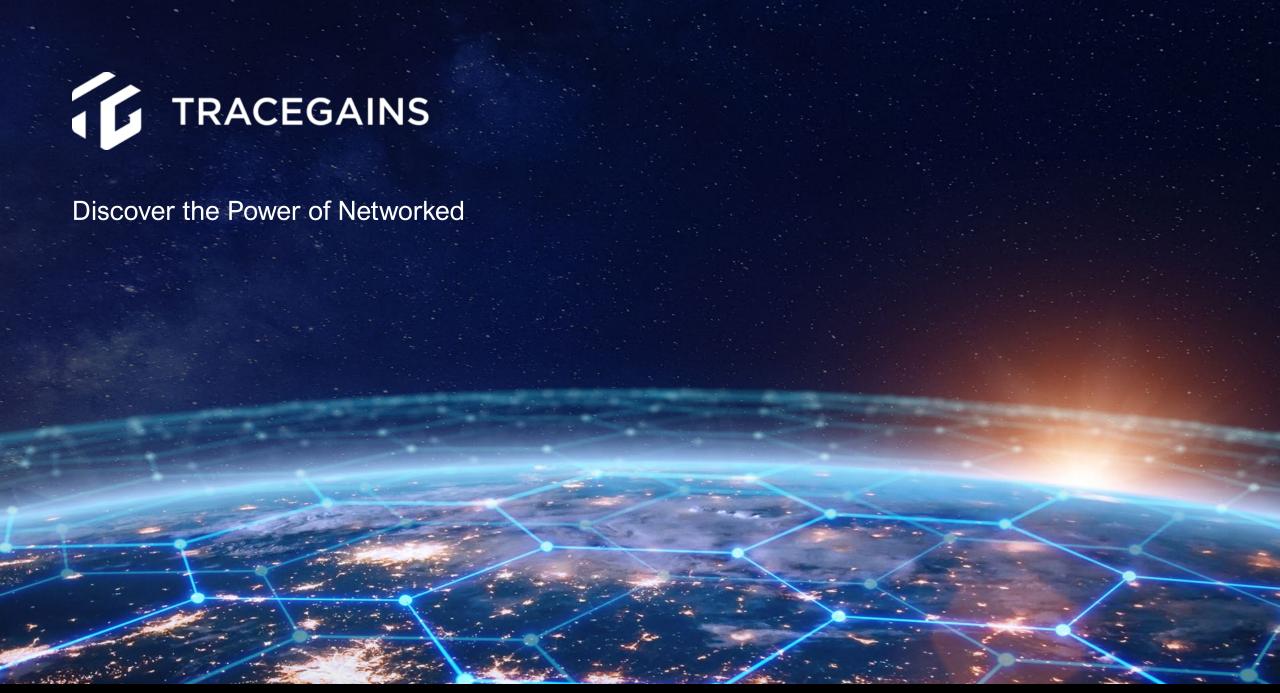


**Food and Beverage** 

**Dietary Supplements** 

Retail

••• Consumer Packaged Goods



#### **What Makes TraceGains Different?**

On average, companies find that 80% of their suppliers are already on TraceGains Network.







**Dr. Alex Brandt**Chief Science Officer
Food Safety Net Services

Kevin Dineen Account Executive TraceGains





# How to Approach Process Validation

NOV 30 **2022** 

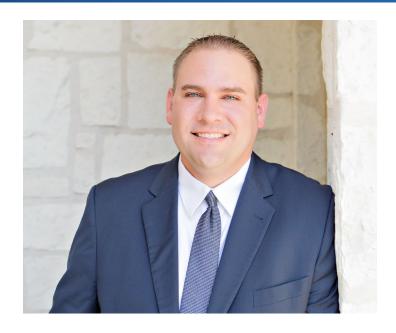
## Certified Group

- Leading North American provider of testing and regulatory consulting services. Thirty locations and ~1500 employees.
- USA, Canada, and Mexico
- Family of Companies:
  - Certified Laboratories Food and Beverage
  - FSNS Food and Beverage
  - Micro Quality Labs Supplements, Personal Care, Cosmetics, Cannabis/CBD
  - Microconsult Inc Supplements, Personal Care, Cosmetics, Cannabis/CBD
  - ABC Testing Inc Supplements
  - Labs-Mart Supplements, Cannabis/CBD
  - Labstat E-Cigarettes and Nicotine
  - EAS Consulting Consulting Services



# Speaker Background

- Education and research in food science and microbiology.
- Employed with FSNS for eight years.
- Leads the contract research laboratory known as Lab+.
- Lab+ conducts challenge studies, process validations, method validations, and other project-based services.
- Lab+ also conducts other non-routine testing services such as foreign material identifications, spoilage investigations, pathogen subtyping, meat speciation, GMO testing, etc.







#### Process Validation Overview

- What is a Process Validation?
- How to know if a process validation is needed
- Where and how do we conduct process validations?
- Processing validation types and considerations
- Process Authority Services
- Best Practices
- Certified Group Services

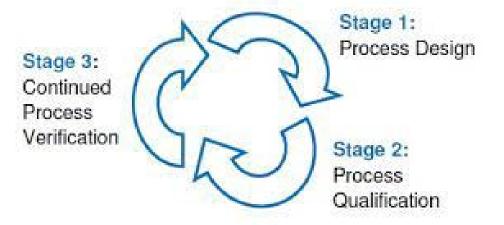




#### What is Process Validation?

- Verification of the Efficacy of a Process
  - Does this process achieve its intended effect?
    - E.g. 5-log reduction of vegetative pathogens of interest
  - Most often a comparison of initial organism concentration to post-process concentration
- Most multi-disciplinary and complex study type
  - Microbiology
  - Engineering
  - Food Science/Safety
  - Chemistry
  - Regulatory/Legal

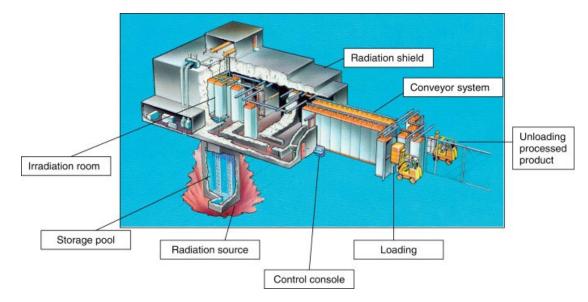
#### **Process Validation**





## Process Validation Types

- As many as there are food processes
  - Thermal
    - Extrusion
    - Dry-heat
    - Steam heat
    - Blanching
  - Irradiation
  - Sanitizer
  - Pressure (HPP)
  - Microfiltration
  - Bactericidal Product Properties
  - Fermentation/Curing
  - Consumer Cook Instructions
  - Commercial Sterility/Retort







## Do I Need Process Validation?

- New regulations increase focus on preventative action
- FDA-FSMA requires validation and verification of a kill step for all RTE/RTD products (21 CFR 507.3)
- USDA-FSIS regulated plants are required to validation Critical Control Points [9 CFR 417.4(a)(1)]







## Do I Need Process Validation?

- Some processes are considered "safe harbor"
  - Require verification of processing parameters, but not necessarily direct evaluation with inoculated product
  - Process Authority detailing performance standards and reviewing data supporting compliance may be sufficient
- Inoculated study may not be needed in some cases:
  - Traditional pasteurization processes
  - Certain meat cooking processes
  - Certain baked goods processes





### Do I Need Process Validation?

- Is necessary if:
  - Insufficient publicly available data and/or regulatory guidelines to support many processes via Process Authority alone
    - Therefore, data needs to be generated and a process validation is often the optimal means for doing so
  - Verification of the processing parameters is difficult-to-impossible
    - For example, cannot confirm internal product temperature achieved during production
  - Significant changes to the process/product since previous validation was performed





#### Process Validation - Where?

#### The Conundrum

- Most validations are focused on foodborne pathogens
- And, the most accurate estimation of the efficacy of a process would be achieved by running the actual in-plant process
- But, bringing pathogen ladened product to a food production facility is a risky proposition and can be disruptive to operations...





#### Process Validation - Where?

- The Solutions
  - Laboratory Simulation
  - Surrogate Validation Study
  - In-Plant Validation via Surrogate
  - Client-Side Pilot Plant Facility









## Laboratory Simulation

- Replication of process in a laboratory environment where live pathogens can be used
- Can be sufficient in and of itself as verification of a process
  - Depends on expected fitness/precision of simulation
- Protip: Adding a surrogate candidate alongside the pathogens can qualify a surrogate for future in-plant studies









## Surrogate Validation

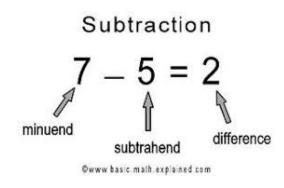
- What is a surrogate organism?
  - Benign organism that serves as a suitable proxy for estimating the effect of processing conditions on the organism of interest (e.g. pathogens)
- Verification of the suitability of the candidate organism should be done prior to using a surrogate for in-plant validation
  - Surrogates for some products and processes are already established and do not require surrogate validation
  - If not, laboratory simulation with a surrogate candidate included is often the best place to start





#### In-Plant Validation

- Surrogate organism introduced to product or ingredient at high levels  $(10^7 10^8)$
- Material then run through the manufacturing process
- Comparison of the initial organism concentrations to the finished product concentrations determines log reduction achieved







#### Client-Side Pilot Plant

- Access to manufacturing equipment that serves as a direct analog to the production facility
- Can introduce live pathogens?
  - If completely removed from commercial operations and never used to produce food intended for consumption, yes
- Unfortunately, this is rarely an option
  - Most clients do not have pilot plants
  - Those that do often want to make test batches that can be consumed.

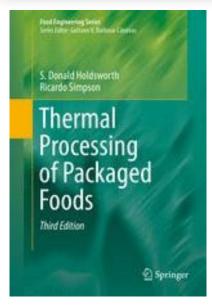




#### Thermal Validation

- Inactivates microorganisms by denaturing proteins
- Critical Considerations
  - Set Point Temperature
  - Dwell/Residence Time
  - Batch Size
  - Product Temperature Achieved
  - Product Specifications
    - Moisture Content
    - Density
    - pH
    - Piece Size

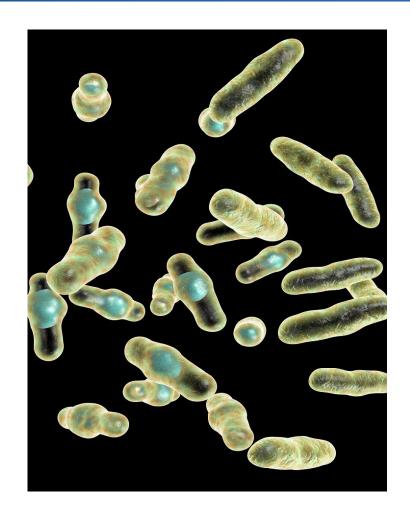






# Cooling Curve

- Determination of risk associated with the product being within the temperature growth range of pathogenic bacteria on its way to refrigerated temperatures
- Specific interest with *Clostridium perfringens* 
  - Heat resistant spores
  - Fast doubling time
- Critical Considerations
  - Time from 135°F to 41°F
    - Study needs to replicate the full cooling curve
  - Product Specifications
    - pH, water activity, preservatives, etc.

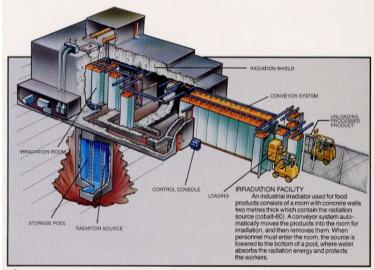




### Irradiation Validation

- Uses ionized radiation to damage/destroy microorganisms
- Critical Considerations
  - Irradiation Type
    - Electron Beam
    - Gamma ray
    - X-ray
    - UV-C
  - Total Dosage
  - Product Specifications
    - Moisture Content
    - Density
    - Piece Size
    - Color/Absorption

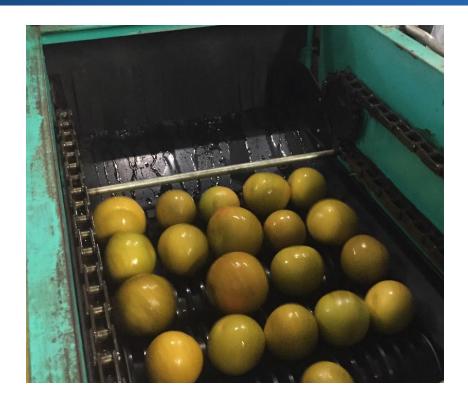






#### Sanitizer Validation

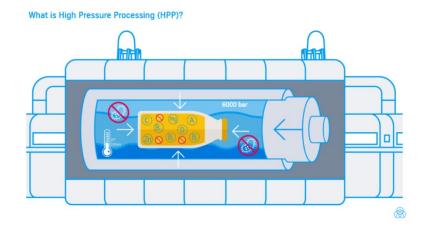
- Chemical inactivation of organisms
- Critical Considerations
  - Sanitizer Type
  - Concentration
  - Exposure Time
  - Mode of Delivery
    - Direction of Spray
    - Volume delivered per unit
    - Mechanical action





## High Pressure Processing

- Using high pressure on the product directly to inactivate organisms
- Critical Considerations
  - Maximum Pressure (87K PSI)
  - Time at Maximum Pressure
  - Come-up/down times
  - Product Specifications
    - Water activity
    - pH
    - Initial product temperature



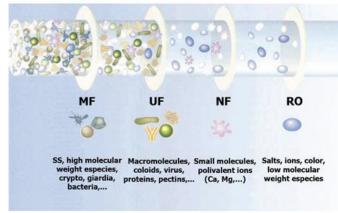




#### Microfiltration Validation

- Using filters to physically separate the organism from the product
- Critical Considerations
  - Pore Size(s)
  - Filter material type(s)
  - Product Specifications
    - Suspended Particulates
    - Bactericidal Properties







#### Hold Time Validation

- Effectively a challenge study
- Critical Considerations
  - Time
  - Product Specifications
    - pH
    - Moisture Content/water activity
    - Packaging System
    - Any/all other innate properties that can impact bacterialcidal efficacy of the product





## Curing Validation

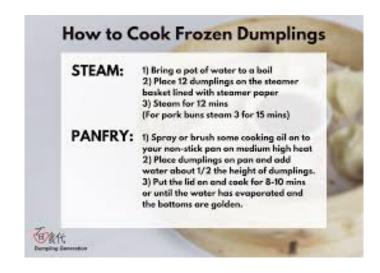
- Preservation technique that uses salts to draw moisture out of a food rendering the water potential too low to support growth
- Critical parameters:
  - Duration of curing/drying process
  - Ambient humidity
  - Salt volume used relative product volume or surface area
  - Final moisture/water activity





## Cooking Instruction Validation

- Raw product is rendered Ready-to-Eat (RTE)
   via consumers following cook instructions
- Critical parameters:
  - Cook appliance(s)
  - Temp/power settings
  - Duration
  - Internal temperature achieved
  - Product specifications
    - e.g. moisture







## Commercial Sterility

- Type of processing that renders a product free of organisms that can grow at non-refrigerated temperatures
- More than ones means to achieve
  - Retort
  - UHT
  - Microfiltration
- Validation success criteria and standards are more strict and Process Authority highly recommended







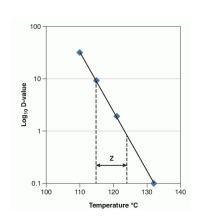


## **Process Authority**

- In some cases, a Process Authority Letter may be sufficient in lieu of process validation
  - Does require additional supporting data that verification the processing parameters and product specifications
  - Supporting data may also come from modeling data (e.g. Combase), published studies and/or other authoritative sources









## **Process Authority**

- Can add value even when process validation is required
  - Reducing scope/scale of validation exercise
    - Grouping together like products and processes to reduce the total variations that needed to be evaluated
  - Serving as a 2<sup>nd</sup> opinion on interpretation validation data generated
  - PA letter is an open, living document that can be updated faster and more cost efficiently than repeating a validation study



#### **Best Practices**

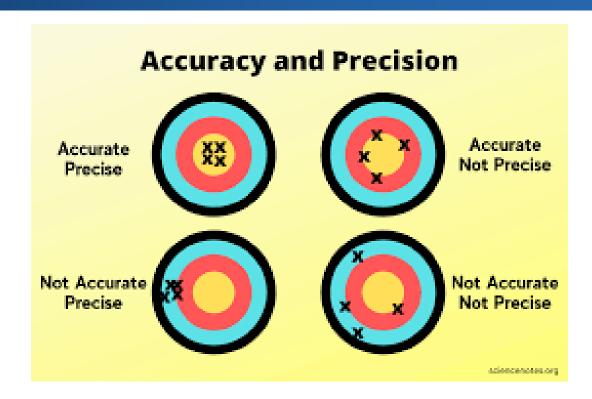
- Evaluation of 'worst case" parameters
  - Validation should be performed in a fashion that verifies conditions the least favorable to the inactivation of the organisms
    - Lowest temperature/duration for thermal treatment
    - Largest batch size relative equipment capacity
    - Highest product pH for acid inactivation
    - Lowest water activity for HPP
    - Consumer deviation with a cook procedure





### **Best Practices**

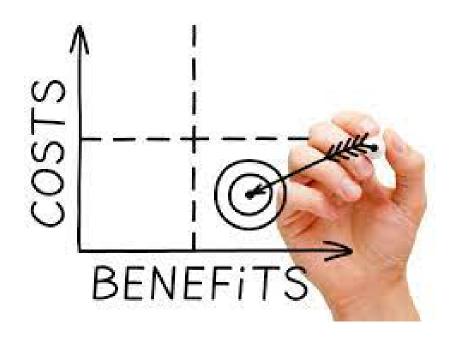
- Redundancy and Replication and Redundancy
  - Sampling replicates increases accuracy and tests the precision of any individual data point
  - Trial replicates increases accuracy and tests the precision of entire body of data
  - Specific numbers of trials are not usually dictated by regulators
    - "More than one" sets minimum trial replicates at two
  - Consideration of inherent variation in the process and product should be given when deciding on number of trials/replicate





### **Best Practices**

- Sampling and Trial Replicates
  - Cost-to-Value Determination
    - Cost/point of data generally goes down considerably as you add replicates
    - Does have diminishing returns
  - Ultimately comes down to client
    - Projects are often quoted with multiple variable inputs and their associated costs

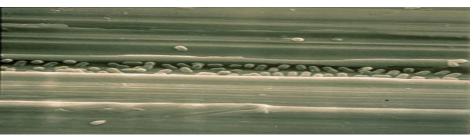




### **Best Practices**

- Schedule a call with all parties before moving to proposal
  - There is always nuance in objectives, requirements and budget
- Caution needs be taken when bringing surrogates in a food manufacturing environment
  - Though benign, it's a lot of bugs
- Include surrogate candidate in lab-based process simulations







## Certified Group Services

#### LabPlus

- Over a dozen qualified project managers across three U.S. locations
- Wide range of expertise in study design covering the gamut of processing applications, food and beverage categories and regulatory jurisdiction

#### EAS Consulting

• Large stable of Process Authorities and SME who can provide assistance and guidance to a client from process design through full implementation and compliance









### **Contact Information**

Alex L. Brandt, Ph.D.

Chief Science Officer

**Food Safety Net Services** 

alex.brandt@fsns.com

D: 210-384-5463

C: 210-284-9427

contractresearch@certifiedgroup.com



# **Kevin Dineen**Account Executive



#### **TraceGains Product Suite**

R&D / NPD TEAMS

QUALITY and REGULATORY COMPLIANCE TEAMS

Marketplace Formula Management **Networked Intelligence** Spec Management - Raw Materials / Spec Management - Finished Goods Supplier Management **Audit Management** Supplier Compliance **Quality Management Customer Management** TRACEGAINS C TO C SUITE CONCEPT CONSUMPTION

### Supplier Compliance

Accelerated sourcing with supplier scorecards and industry intelligence.

#### THE PROBLEM

Risk and variability can be hard to spot, and outstanding supplier performance easy to miss.

#### WHY IT MATTERS

A single issue can drive huge costs, while tiny trends can hurt over time.

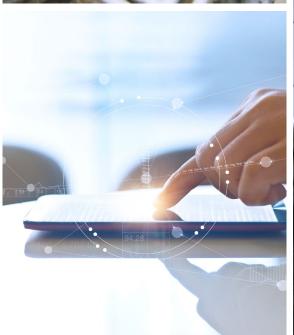
#### THE SOLUTION

Score performance, customize templates and automate processes.

#### THE TRACEGAINS DIFFERENCE

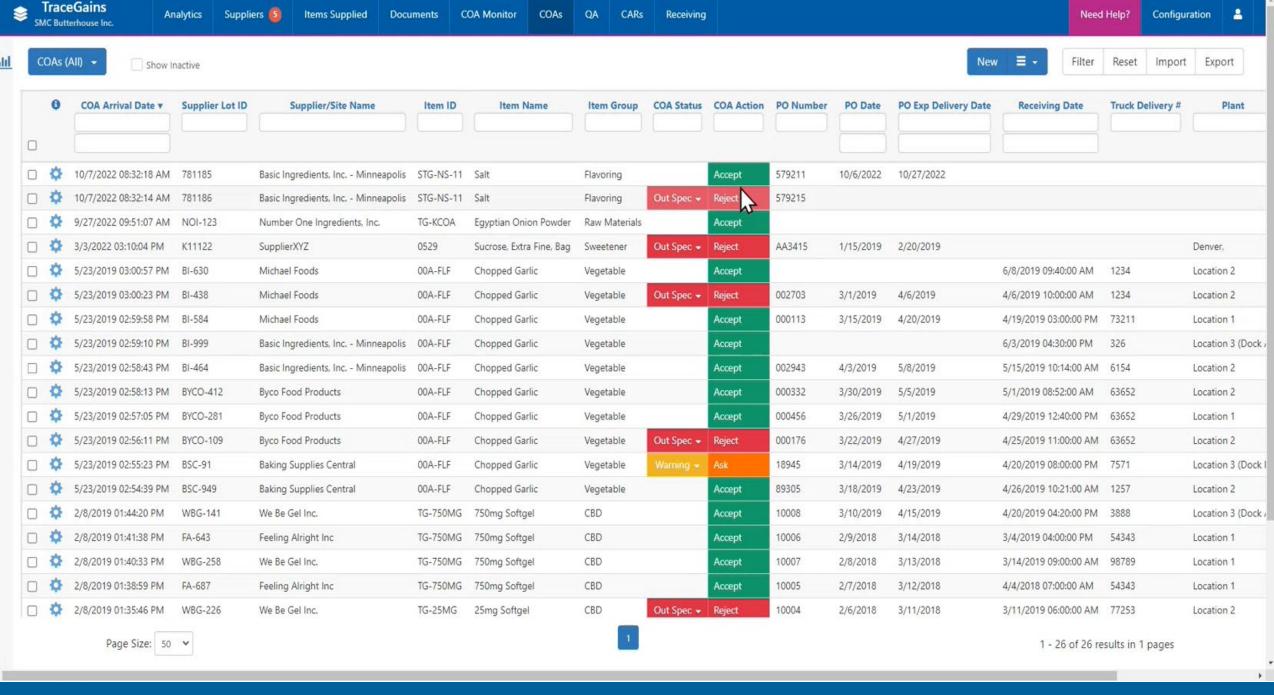
Real-time information integrated with ingredient specification-level data.













Analytics

opliers 🙆

Items Supplied

Documents

**COA Monitor** 

COAs

C

Receiving

Need Help?

Configuration



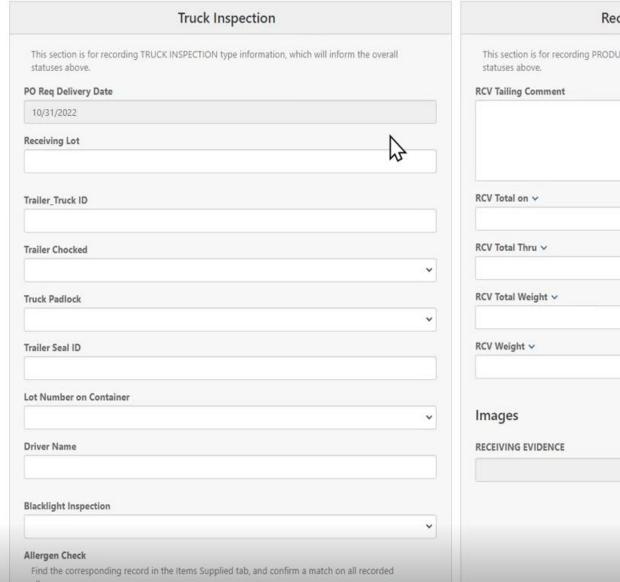


Audit Trail

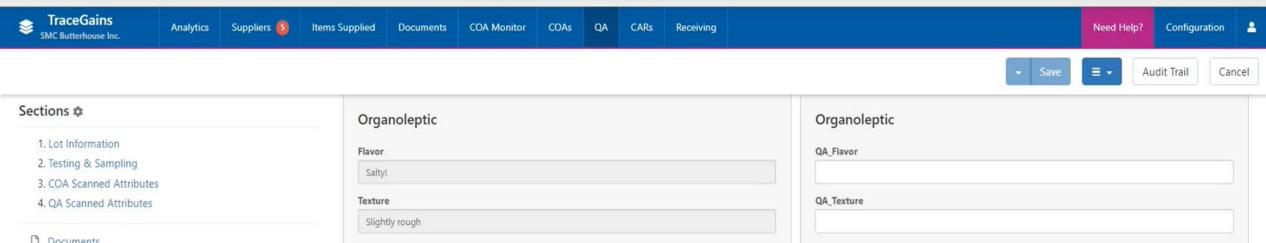
Cancel

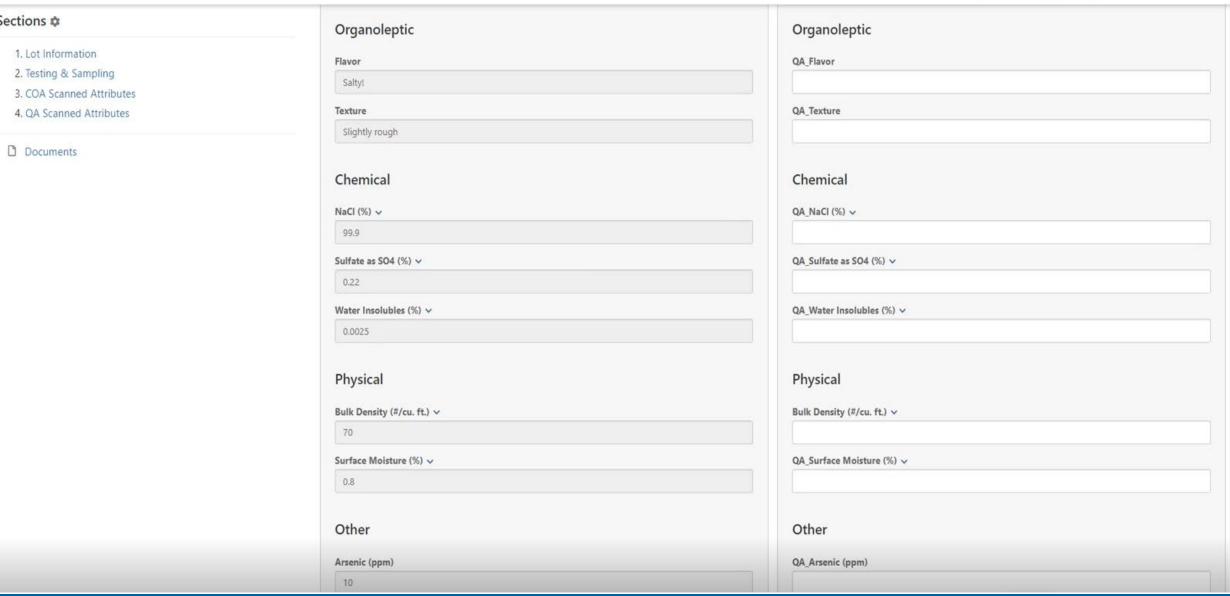
#### Sections 🌣

- 1. Transaction Information
- 2. Shipment and Unloading Information
- 3. Truck Inspection
- 4. Receiving Item Inspection
- Documents



This section is for recordir statuses above.	ng PRODUCT INSPECTION type information, which will inform the overall
RCV Tailing Comment	
	<u> </u>
RCV Total on 🗸	
RCV Total Thru V	
2010 100 000	
RCV Total Weight V	
RCV Weight ~	
mages	
RECEIVING EVIDENCE	0





### Quality Management

Centralized quality control with the power of real-time data.

#### THE PROBLEM

Manual and unintegrated quality processes are costly and risky.

#### WHY IT MATTERS

Cost, risk and audit exposure are major concerns for every business.

#### THE SOLUTION

Centralize quality and safety plans, data and corrective actions in one system.

#### THE TRACEGAINS DIFFERENCE

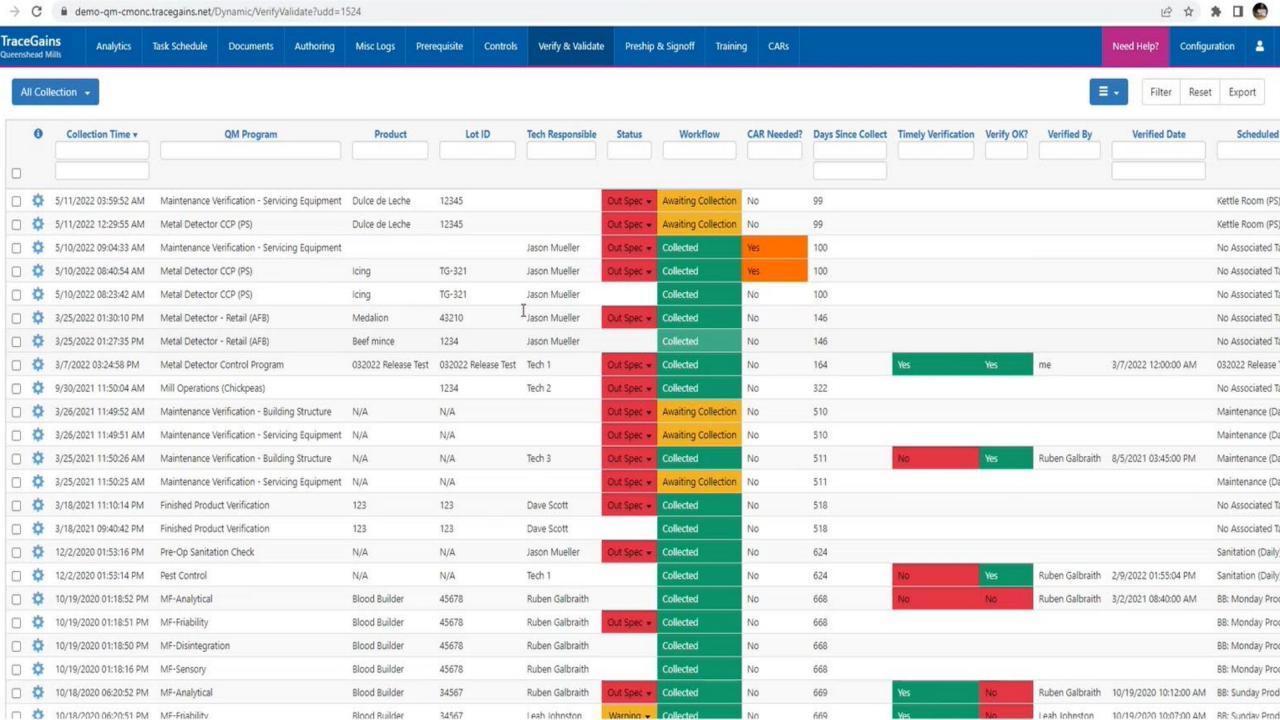
Leverage industry standard forms, with data flowing throughout the system.











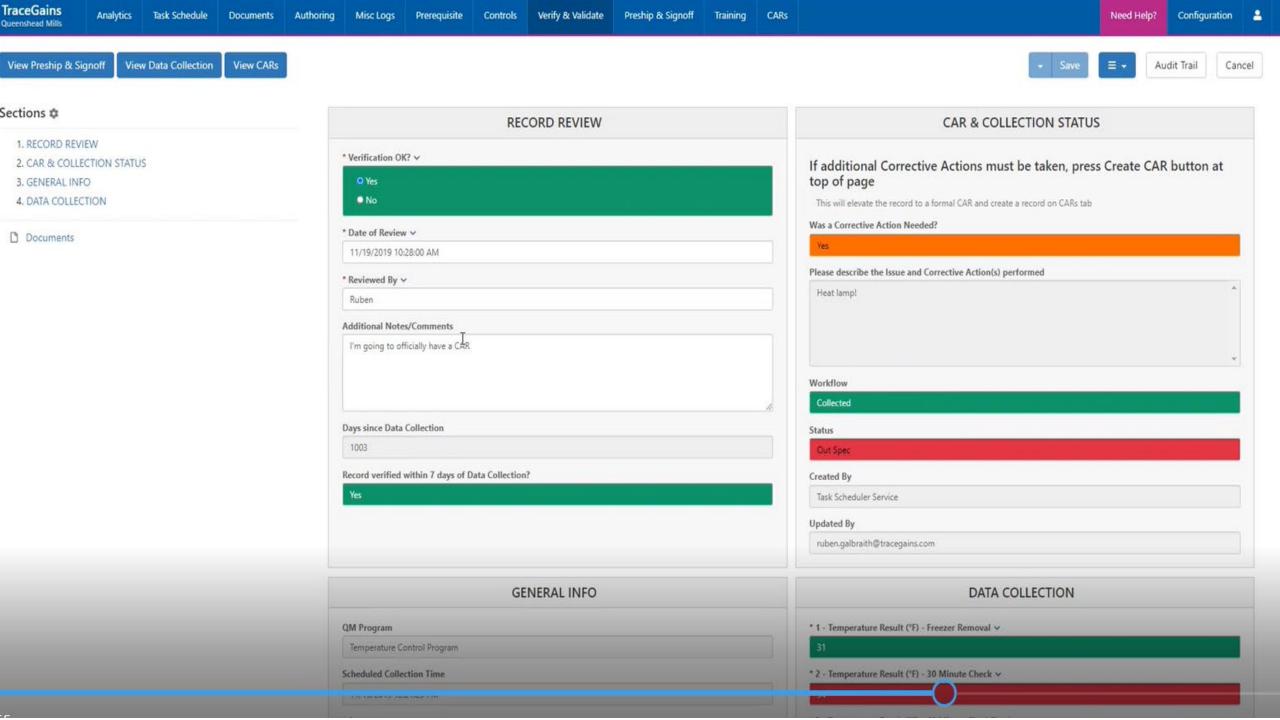
Need Help? Configuration ...

Filter Reset Export

■.

CAR Needed •

0	QM Program	Collection Time ▼	Status	Workflow	Tech Responsible	CAR Needed?	Days Since Collect	Timely Verification	Verify OK?	Verified By	Verified Date	Scheduled Task Name	Tab
)													
•	Maintenance Verification - Servicing Equipment	5/10/2022 09:04:33 AM	Out Spec •	Collected	Jason Mueller	Yes	100					No Associated Task	PreRequisite
•	Metal Detector CCP (PS)	5/10/2022 08:40:54 AM	Out Spec +	Collected	Jason Mueller	Yes	100					No Associated Task	Controls
•	Lot Code Control Program	12/4/2019 12:42:00 PM	Out Spec 🕶	Collected	Tech 2	Yes	988	Yes	Yes	Ruben Galbraith	12/4/2019 11:46:00 AM	Thawing Procedure - Wednesday	Controls
ф	Lot Code Control Program	11/27/2019 01:08:25 PM	Out Spec -	Collected	Tech 3	Yes	995	Yes	Yes	Ruben Galbraith	11/27/2019 11:09:00 AM	No Associated Task	Controls
*	Lot Code Control Program	11/19/2019 12:21:26 PM	Out Spec 🕶	Collected	Tech 2	Yes	1003	No	Yes	Ruben Galbraith	9/27/2021 11:58:14 AM	Thawing Procedure - Tuesday	Controls
•	Temperature Control Program	11/19/2019 12:21:25 PM	Out Spec 🕶	Collected	Tech 2	Yes	1003	Yes	Yes	Ruben	11/19/2019 10:28:00 AM	Thawing Procedure - Tuesday	Controls
ф	Customer Complaint Log	11/19/2019 10:33:35 AM		Collected	Tech 2	Ves	1003	Yes	Yes	Larry Ladhands	11/19/2019 09:38:00 AM	No Associated Task	Misc Logs
•	Customer Complaint Log	11/18/2019 01:41:25 PM		Collected	Ruben Galbraith	Yes	1004	Yes	Yes	Larry Ladhands	11/18/2019 12:46:00 PM	No Associated Task	Misc Logs
ф	Customer Complaint Log	11/18/2019 09:55:30 AM		Collected	Tech 3	Yes	1004	Yes	Yes	Larry Ladhands	11/1/2019 12:00:00 AM	No Associated Task	Misc Logs
ф	Pre-Op Sanitation Check	10/25/2019 01:29:53 AM	Out Spec 🕶	Collected	Tech 2	Yes	1028					Prod Line 3 - Sour Dough	PreRequisite
Ф	Lactose Bag Weight Log	2/27/2019 10:31:46 AM	Out Spec 💌	Collected	Tech 1	Yes	1268	No	Yes	Jason Mueller	1/15/2020 02:00:00 PM	No Associated Task	Misc Logs
Ф	Metal Detector Control Program	2/14/2019 01:34:13 PM	Out Spec 🕶	Collected	Tech 2	Yes	1281	No	Yes	David Scott	3/27/2020 06:00:00 PM	No Associated Task	Controls
•	Pre-Op Sanitation Check	12/10/2018 10:38:24 AM	Out Spec -	Collected	Tech 1	Yes	1347	No	Yes	Ruben	10/24/2019 01:44:00 PM	No Associated Task	PreRequisite
•	Pre-Op Sanitation Check	8/9/2018 12:55:16 PM	Out Spec 💌	Collected	Tech 2	Yes	1470	No	Yes	David Scott	3/27/2020 06:00:00 PM	No Associated Task	PreRequisite
•	Pest Control	3/29/2018 09:39:49 AM		Collected	Tech 2	Yes	1603	No	Yes	David Scott	3/27/2020 06:00:00 PM	Prod Line 1 - Whole Wheat Bread (1)	PreRequisite
•	Magnet Control Program	2/13/2018 06:28:04 PM	Out Spec 🕶	Collected	Tech 1	Yes	1647	No	Yes	Ruben Galbraith	6/29/2018 10:00:00 AM	No Associated Task	Controls
•	Scale Verification - Large Scale	2/13/2018 06:16:24 PM	Warning •	Collected	Tech 3	Yes	1647	No	Yes	Ruben Galbraith	6/29/2018 10:00:00 AM	No Associated Task	PreRequisite
•	Bacon - #3459	2/8/2018 11:18:49 AM	Out Spec 🕶	Collected	Tech 3	Yes	1652	No	Yes	Jason Mueller	7/4/2018 09:00:00 AM	No Associated Task	Controls
•	Pre-Op Sanitation Check	2/6/2018 11:18:33 PM	Out Spec +	Collected	Tech 1	Yes	1654	No	Yes	Jason Mueller	9/6/2018 11:00:00 AM	No Associated Task	PreRequisite
•	Line Downtime Log	1/30/2018 12:33:11 PM	Warning •	Collected	Tech 2	Yes	1661	No	Yes	David Scott	4/20/2019 01:00:00 PM	No Associated Task	Misc Logs
₽	Weight Control Program	1/9/2018 04:58:53 PM	Out Spec 💌	Collected	Tech 3	Yes	1682	No	Yes	Ruben Galbraith	3/9/2018 02:00:00 PM	Prod Line 1 - BBQ001 08212017	Controls
ф	Magnet Control Program	11/27/2017 11:36:32 AM	Out Spec 🕶	Collected	Tech 1	Yes	1725	No	Yes	Ruben Galbraith	9/28/2018 12:00:00 PM	No Associated Task	Controls
ø	Product Donation Rework Waste Log	11/22/2017 02:15:55 AM	Out Spec +	Collected	Tech 1	Yes	1730	No	Yes	Ruben Galbraith	9/28/2018 12:00:00 PM	No Associated Task	Misc Logs



### Live Q&A

Type your questions into the chat box!

# Win a Cup of Coffee...

Take our survey and be entered to win a \$10 gift card to your favorite coffee shop!





### Thank You

