The Challenge of Conducting Challenge Tests

International Association for **Food Protection**

• Hélène Bergis, Presenter

ANSES: French Food Safety Agency

• Paul in 't Veld, Presenter

Netherlands Food and Consumer Product Safety Authority

• Florence Postollec, Presenter

ADRIA

Mariem Ellouze, Moderator

Nestlé Research Center

Sponsored by the IAFP Foundation

Organized by the IAFP Microbial Modelling and Risk Analysis PDG

Webinar Housekeeping

International Association for **Food Protection**

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Microbial Modelling and Risk Analysis PDG Chair: Bala Kottapalli, Conagra Brands Vice Chair: Panagiotis Skandamis, Agricultural University of Athens



Mariem Ellouze Senior specialist Microbial Risk Assessment,

Food Safety Microbiology Group Food Safety Research Department Institute of Food Safety and Analytical Sciences Nestlé Research, Lausanne, Switzerland



- Project Management
- Technical assistance
- Chair of ICPMF
- Member of ISO 20976 (Challenge Tests for growth and inactivation)
- Project Leader of ISO PWI 23691
 Determination and use of cardinal values in predictive microbiology

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Florence Postollec Project manager ADRIA - UMT ACTIA19.03 ALTER'iX, France

For the past 14 years, she is collaborating with the Mafart Team on risks associated to foodborne sporeformers within the frame of UMT ACTIA competitive national cluster. This collaboration, based on shared Research & Developpement axis, aims at increasing knowledge and expertise to better mitigate sporeformer contaminants involved in food safety and spoilage issue. Her main interest relies in biodiversity and behaviour heterogeneity induced after stress exposure. She is involved in the developpement of applied scientific projects or services related to sporeformer hazard identification, process or shelf-life optimization in close collaboration with food industrials.

ADRIA, an independent and non-profit organization, is a leading Food Technology Institute in food safety & quality that provide technical support and services to food industries and suppliers. Our lab and experts are recognized by the French Food Ministry (DGAL) for the validation of challenge test studies for the determination of food shelf-life.

RÉPUBLIQUE FRANÇAISE

MINISTÈRE

ET DE LA PÊCHE

CHALLENGE TESTING & STANDARDISATION, RECENT DEVELOPMENTS

Florence POSTOLLEC florence.postollec@adria.tm.fr



13 september 2019



STANDARDIZATION

 Process of developing and implementing technical guidelines based on a consensus



A PROCESS AS A WHOLE

REGULATION

A law, rule, or other order prescribed by the competent authority

STANDARDIZATION

Development and implemention of technical guidelines based on a **CONSENSUS**



ACCREDITATION Competences assessment of a

laboratory

ALIDATION/CERTIFICATION Performances assessment of a method



ISO STANDARDS

 International Standardization Organization: independent, non governmental international organization with a membership of 164 national standards bodies

 ISO standards are developed within several Technical Committees (TC), Sub Committees (SC) and Working Groups (WG)

 \rightarrow ISO TC34/SC9 Microbiology of the food chain

Liaisons with various bodies and organization

→AOAC International, CAC, EC, ICMSF, IDF, IUMS, WHO ...



More info on www.iso.org

• Context: On the application of general principles of food hygiene, it is the responsibility of the Food Business Operators (FBO) to control microbial risks in foods. Therefore, the FBO shall conduct studies in order to investigate compliance with the criteria throughout the production and storage processes.

In the framework of Microbial Risk Assessment (MRA), several complementary approaches are developed to estimate food safety and food quality risks posed by pathogen or spoilage microorganisms in the food chain. MRA is adopted by regulators under the auspices of the international agency for setting food standards



o Creation date: 2014

o Secretariat: AFNOR (France),

Stéphanie Tiprez (Secretary) & Florence Postollec (Convenior)

• Objectives: to provide technical rules and calculations approaches to investigate the ability of inoculated micro-organism of concern to grow or survive in the raw materials, intermediate or end-products under different reasonably foreseeable food processes, storage and use conditions.

• Members: experts from food industry, food technology institute, food testing laboratory, research center and regulatory bodies + support team, liaison representative, document monitor & technical program manager to ensure smooth & efficient development



• Deliverable: 3 standards on microbiology of the food chain

ISO 20976-1:2019 Requirements and guidelines for conducting challenge tests of food and feed products – **part 1**: challenge tests to study growth potential, lag time and maximum growth rate

ISO PWI 20976-2 Requirements and guidelines for conducting challenge tests of food and feed products – **part 2**: challenge tests to study inactivation potential and kinetics parameters

ISO PWI 23691 Determination and use of cardinal values in predictive microbiology



• Standards development process in 6 steps

ISO PWI 20976-2 Requirements and guidelines for conducting challenge tests of food and feed products – part 2: inactivation

ISO PWI 23691 Determination and use of cardinal values Formal vote Enquiry on **DIS** on FDIS New work Building Consensus Publication of item proposal building expert (draft (final draft **ISO** standard (NP) within TC/SC consensus international international standard) standard)

Requirements and guidelines for conducting challenge tests of food and feed products - ISO 20976-1:2019 – part 1: growth



ISO 20976-1:2019

Requirements and guidelines for conducting challenge tests of food and feed products – part1: challenge tests to study growth potential, lag time and maximum growth rate

o Publication: in march 2019

👿 English 🗸	Online Browsing Platform (OBP)	₩ Signin → Language → Help Search
International Organization for Standardization	SO 20976-1:2019(en) Microbiology of the food chain — Requirements tests to study growth potential, leg time and max	and guidelines for conducting challenge tests of food and feed products — Part 1: Challenge
When the world agrees	E Table of contents Foreword Introduction 1 Scope	Avstable in: en t a a a a a a a a a a a a a a a a a a
Standards All about ISO Taking part Store	2 Nomible references 3 Terms and definitions E Principle 4 1 General	SO the International Organization for Standardization) is a workdwich Release in antional structures (ISO member hodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be preparented on that committee. International arganizations, governmental and non-governmental, in hasion with SO, also late part in the work. SO collaborates closely with the International Electrotechnical Commission (EC) and an electrotechnic electrotechnic clandardization.
Standards catalogue Publications and products	4.2 Evaluation of the growin polential 4.3 Estimation of the growth kinetics parameters (lag time and maximum growth rate) 5 Apparatus 6 Culture media and reasents	The procedures used to develop this document and those intended for its further maintenance are described in the ISO/EC Directives, Part 1. In particular, the offlevent approval criteria neeked for the offlevent types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/EC Directives, Part 2 (see <u>www.sc.org/sirectives</u>).
\clubsuit > Store > Standards catalogue > Browse by ICS > 07 > 07.100 > 07.100.30 > ISO 20976-1:2019	© course investa allo registrici ☐ 7 Study design and sampling 7.1 General 7.2 Sotting decision criteria for growth potential	Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. SO shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO ist of patent declarations received (see <u>www.cs.org/batents</u>).
ISO 20976-1:2019 Preview	7.3 Number of backhols and selection orderna 7.4 Preparation of the test units 7.5 Number of test units to be inoculated 8 Selection of strains	Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement. For an explanation of the voluntary nature of standards, the meaning of 1500 specific terms and expressions nelated to conformity essessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barniers to Trade (TB) are were so conjectionmont thread.
Microbiology of the food chain Requirements and guidelines for conducting challenge tests of food and feed products Part 1: Challenge tests to study growth potential, lag time	B Preparation of the incodum I General Q P Proparation of the vegetative cell suspensions Q Proparation of the vegetative cell suspensions Figures Tables	This document was prepared by Technical Committee (SOTC 34, Food products, Subcommittee SC 9, Microbiology A list of all the parts in the ISO 20076 senies can be found on the ISO website. Any feedback or questions on the Socument should be directed to the user's national standards body. A complete listing of these bodies can be found at <u>away iso explorembers html</u>
and maximum growth rate	√ce Equations	

ISO 20976-1:2019

 Scope: this document specifies protocols for conducting microbiological challenge tests for growth studies on vegetative and spore-forming bacteria in raw materials and intermediate or end products

o Principle

✓ Growth POTENTIAL studies : Validate the specific food characteristics and conditions applied. → When microbiological criteria are not fulfilled or conditions are changed, a new growth potential study is carried out

✓ Growth KINETICS studies : Estimate and validate the microbiological food shelf-life. → Tests particularly suitable for food innovation.... more informative but as well more complex than growth potential studies



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Training, audit & advices

- Training & events
- Advices, regulatory support
- HACCP, BRC, IFS, ISO 22000 Audits



Food & pack solutions

- Functional ingredient characterization
- Food packaging
- Food innovation



Food safety & quality

- Molecular typing
- Risk assessment on pathogens & spoilage microflora
- Method validation studies in food microbiology



Scientific developments & valorization

- Phenotypic & molecular characterization
- Risk assessment on sporeforming complex microflora
- Development of generic predictive microbiology approaches



Hélène Bergis



Research Engineer at the French Food Safety Agency (ANSES)

European Reference Laboratory Lead for *Listeria monocytogenes*.

Involved in trainings to the competent European authorities

Performs audits of the laboratories recognized by the French authorities to perform *L. monocytogenes* challenge tests.





Investigate, evaluate, protect



EURL Lm

European Union Reference Laboratory

for Listeria monocytogenes

Listeria monocytogenes and challenge testing

Hélène Bergis EURL for Listeria monocytogenes







 Regulation (EC) No 2073/2005 lays down microbiological criteria for certain micro-organisms and the implementing rules to be complied with by Food Business Operators (FBOs)

- Article 3 'General requirements'
- "FBOs shall ensure that foodstuffs comply with the relevant microbiological criteria set out in Annex I."







Food safety criteria for RTE foods / Lm (Annex I of Regulation (EC) 2073/2005)

Food category	Sampling plan		Limits	Stage where the criterion applies	
	n c m = M		m = M		
1.1 RTE foods intended for infants and RTE foods for special medical purposes	10	0	Abs. in 25 g	Products placed on the market during their shelf-life	
1.2 RTE foods able to	5	0	100 cfu/g	Products placed on the market during their shelf-life	
support the growth of <i>L</i> .					
<i>monocytogenes</i> other than those intended for infants and for special medical purposes	5	0	Abs. in 25 g	Before the food has left the immediate control of the food business operator who has produced	
1.3 RTE foods unable to support the growth of <i>L</i> .	5	0	100 cfu/g	Products placed on the market during their shelf-life	
monocytogenes other than					
for special medical purposes					







Annex II of Regulation (EC) 2073/2005 specifies the elements to be included in the studies conducted by the FBOs to investigate the compliance with the defined criteria throughout the shelf-life.

✓ Characteristics of the product: physico-chemical characteristics, preservatives content, type of packaging, process, foreseen shelf-life

✓ Available scientific literature and research data regarding the growth and survival characteristics of the micro-organisms of concern

✓ And when necessary,

- Predictive microbiology
- Challenge-tests
- Durability studies

European Guidance Documents on Shelf-life studies



International Organization for Standardization	French agency for food, environmental and ecceptional heath safety Food 5.5 forty laboratory Malsone-Alfort, France
When the world agrees	EURL Lm TECHNICAL GUIDANCE DOCUMENT
mich die Hond agrees	for conducting shelf-life studies on <i>Listeria monocytogenes</i> in ready-to-eat foods
	Version 3 of 6 June 2014 – Amendment 1 of 21 February 2019
Standards All about ISO Taking part Store Standards Standards 9 Standards catalogue Publications and products	Annie Beaufort, Hélène Bergis, Anne-Laure Lardeux, Unit Modelling of Bacterial Behaviour, Bertrand Lombard, Manager EU Reference Laboratory for <i>Listeria monocytogenes</i> Anses-Food Safety Laboratory, Maisons-Alfort, France In collaboration with representatives of 10 National Reference Laboratories (NRLs) for <i>Listeria</i>
See Sedectodage Beerly KS (#1.600 00.0000 00.0000 00.0000 ISO 20976-1:2019 Nicrobiology of the food chain Requirements and guidelines for conducting challenge tests of food and feed products Part 1: Challenge tests to study growth potential, lag time and maximum growth rate	 Marie Polet and Nadine Botteldoorn, Scientific Institute of Public Health, Belgium; George Papageorgiou, State General Laboratory, Cyprus; Jens Kirk Andersen and Jeppe Boel, National Food Institute, Danish Technical University, Denmark; Bernadette Hickey, Dairy Science Laboratory, Republic of Ireland; Vincenza Prencipe, Istituto Zooprofilattico Sperimentale dell'Abruzzo e del Molise "G. Caporale", Italy; Wilma Jacobs-Reitsma, National Institute for Public Health and the Environment (RIVM), The Netherlands (NL-NRL); Ife Fitz-James, Netherlands Food and Consumer Product Safety Authority (NVWA), The Netherlands (associated NL-NRL); Celcidina Maria Pires Gomes, Instituto Nacional De Investigação Agrária e Veterinária (INIAV), Portugal; Lenka Cabanova, State Veterinary and Food Institute, Slovakia; Cristina Acebal Sarabia, Institute for Hygiene and Veterinary Public Health, Spain; Taran Skjerdal, Norwegian Veterinary Institute, Norway.



ans

EN ISO 20976-1

EURL Technical Guidance

Scope

Protocols for challenge tests with vegetative, spore forming bacteria in raw material, intermediate or end product

Protocols for challenge tests & Durability study **on Lm in RTE foods**



Growth potential

EN ISO 20976-1

Number of batches

Minimum of 3 batches

Single batch clearly justified: evaluating impact of new formulation of food; using a batch to represent the worst case conditions

EURL Technical Guidance

Determined according a growth / no growth module of a predictive µbiological software:

- 3 batches if growth probability >10%
- 1 batch if growth probability < 10%





Selection of the batches

Be representative of the variability of the production process

EN ISO 20976-1

EURL Technical Guidance

Number of test units / sampling point Refer to Annex B (**normative**) **Min. 1** test unit per sampling point

Min. 3 test units per sampling point

Number of sampling points

5 sampling points

Day 0 and Day end, but recommended to use intermediate points



EN ISO 20976-1

Strains to be characterised (biochemically/ serologically/ genetically)

Selection of strains

Strains isolated from food matrix, product environment or clinical /food environment outbreaks, preferable to culture type collections

Whenever possible use strains where cardinal values are determined.



ISO PWI 23691: Determination and use of cardinal values in predictive microbiology



IAFP webinar « The challenge of conducting challenge tests » September 13, 2019

EURL Technical Guidance

At least 2 strains :

1 with known growth characteristics (EURL Lm set of 25 *Lm* selected fast strains),

others from foods, environment, outbreak, collection

EN ISO 20976-1

Inoculation of the test units i) Inoculation level of at least 5 times the quantification limit of the enumeration and not > 10^4 cfu/g.

ii) when the inoculum conc. is low the limit of quantification can be lowered by increasing the number of plates.

iii) Quality of the inoculation checked atDay 0 : standard deviation < 0,3 log cfu/g

EURL Technical Guidance

Contamination target around 100 cfu/g

Recommended to **lower the limit of quantification of 10 cfu/g** by using 1ml over 3 x 90mm plates or 1 ml onto 140mm plate.



EN ISO 20976-1

Storage of the test units T° for storage should allow growth of target microorganisms and be as close as possible to reasonable foreseeable food storage conditions

EURL Technical Guidance

Table of time temperature combinations for each stage of the cold chain : manufactuer – retail- consumer

	Storage (incubation) temperature			Storage (incubation) duration			
Stage of cold chain						Shelf life ≤ 21 days	Shelf life > 21 days
From manufacture until the arrival to the display cabinet	Temperature justified by detailed information*	Or if not known	<mark>8</mark> 7°C	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	7 days
Retail: Display cabinet	Temperature justified by detailed information**	Or if not known	12 7℃	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	⅔ (shelf life – 7 days)
Consumer storage	Temperature justified by detailed information**	Or if not known	12°C	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	½ (shelf life – 7 days)

* Temperature justified by detailed information: the 95th percentile of the FBO's data observation.

** Temperature justified by detailed information: the $75^{\text{th}} 95^{\text{th}}$ percentile of the observations for the country where the stage of the cold chain is located.

IAFP webinar « The challenge (

EN ISO 20976-1

Results

Calculation of Growth potential (Δ) for each batch

 $\Delta = \log_{max} - \log_{initial}$

Growth potential of the product : highest growth potential values from all the batches.

Reject CT if at time zero, **std dev. > 0.3 log cfu/g** **EURL Technical Guidance**

Calculation of Growth potential (δ) for each batch

 δ = median log _{end} – median log _{initial}

ldem

Study unacceptable, if at Day 0, standard deviation > 0.5 log cfu/g



EN ISO 20976-1

ExploitationSuspected outliers shall be investigatedof the results

If log initial is the highest value from all the test units sampled,

growth potential = 0

EURL Technical Guidance

Use to classify RTE foods

- when $\delta > 0.5$: food classified to be **able to support** Lm growth (cat 1.2 of Reg. (E.C) 2073/2005)
- when $\delta \le 0.5$: food classified to be unable to support Lm growth (cat. 1.3 of Reg.(EC) 2073/2005)

Use to quantify growth of Lm in RTE foods of cat. 1.2

Use to calculate [Lm] at the end of the shelf-life, if [Lm] at the production is known

European perspectives

Revision of Guidances on Lm shelf-life studies for harmonisation



European perspectives

Investigate the storage temperature at consumer level based on a review of available data on domestics refrigerators in Europe

Table 3 of the EURL Lm Technical Guidance document on the storage conditions throughout the cold chain

				Storage (incubation) duration			
Stage of cold chain	Storage (incul	bation) te	mperature			Shelf life ≤ 21 days	Shelf life > 21 days
From manufacture until the arrival to the display cabinet	Temperature justified by detailed information*	Or if not known	<mark>\$</mark> 7°C	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	7 days
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* Temperature justified by detailed information: the 95th percentile of the FBO's data observation.

****** Temperature justified by detailed information: the $75^{\text{th}} 95^{\text{th}}$ percentile of the observations for the country where the stage of the cold chain is located.



European perspectives

Development (by EURL Lm with WG of 6 NRLs and 3 CAs) of a "European Training Support" on food shelf-life studies related to *Listeria* monocytogenes (to be finalized in 2019)

 Train staff of MS's competent authorities involved in inspection of RTE foods regarding the *Listeria monocytogenes* criteria, and in charge of the evaluation of shelf-life studies

 Provide to CAs the information and tools useful to make sure that shelf-life studies, implemented to justify the quantitative criteria for Lm in RTE foods, are satisfactory





Paul in 't Veld

Netherlands Food and Consumer Product Safety Authority (NVWA)



- Working for the competent authority in The Netherlands
- > PhD in food microbiology
- Chair of ISO WG3 on method validation and expert in ISO WG19 on challenge testing
- Involved in evaluation of studies on the growth of *Listeria monocytogenes* in RTE foods.



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Nederlandse Voedsel- en Warenautoriteit Ministerie van Landbouw, Natuur en Voedselkwaliteit

Conducting Challenge Tests for *Listeria monocytogenes*, a real challenge

Paul in 't Veld

Netherlands Food and Consumer Product Safety Authority (NVWA)



How to conduct (additional) studies Modelling Challenge testing





Challengetesting

- > Two types of experimental design:
 - Maximum growth rate determination





Challengetesting

- > Two types of experimental tests:
 - Maximum growth rate determination
 - Determination growth potential





Growth potential determination

Example of factors influencing a challenge test:

- Test of a single product or a group of products
- Selection of batches to be tested
- Selection of strains and culturing them
- > Inoculation of product
- Temperature profile for incubation of a product

- > Intermediate points for testing
- Calculation of the growth potential
- Linking the growth potential to initial contamination
- What to do when product is changed
- Cooperation between FBO and lab



Test of a single product or a group of products

- > FBO can have many products
- Necessary to test each product?
- > How to group products?

 > Use of physico-chemical characteristics (including preservatives) and production process





Inoculation of product

- Depending on the type of product and where (re)contamination can occur.
- Take of care of maintaining MAP conditions.
- Keep original packaging materials as far as possible











Temperature profile for incubation of a product

- Recently revised criteria at EU level.
- Consumer stage still high temperature.
- Possibility to deviate once dat submitted by FBO.
- Take into account national requirements, e.g. NL + BE: 7 °C, 7 °C, 9 °C

J					Storage (incubation) duration				
	Stage of cold chain	Storage (incubation) temperature					Shelf life ≤ 21 days	Shelf life > 21 days	
_	From the manufacture until the arrival to the display cabinet	Temperature justified by detailed information*	Or if not known	<u><u> </u></u>	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	7 days 🛛 🛚	
t	Retail: Display cabinet	Temperature justified by detailed information* <u>*</u>	Or if not known	<u>,12</u> 7°C	Duration justified by detailed information	Or if not known	One third of the total shelf life of the product	¹ / ₂ (shelf life 7 days)	
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	* Temperatu	re justified by de	tailed info	rmation: the	<u>9</u> 5 th percentile	of the <u>FBO</u>	s data observation	m	
	** Temperature justified by detailed information: the 95 th percentile of the observations for the								

Table 3: Flow diagram of storage conditions throughout the cold chain

country where the stage of the cold chain is located.



Calculation of the growth potential

> Is the use of the median always justified?

Day	cfu/g	Log cfu/g	Difference based on median	Growth potential	Difference based on maximum	Growth potential
	90	1,95				
0	95	1,98	2,15 - 1,98 = 0,17			
	95	1,98		0 17	2,15 - 3,70 =	1 66
	55	1,74		0,17	1,55	1,55
42	150	2,15				
	5000	3,70				



Cooperation between FBO and lab



Maximum growth rate

- Basis the same as for determination growth potential.
- > Advantage:
 - More flexible: results are independant from temperature during storage and shelf life duration.
 - Tests are done at constant temperature, e.g. 8 °C.

> Disadvantage:

- More expensive: strains have to be tested individually.
- Need to consider 95% confidence limits
- More difficult calculations are needed.



How to conduct additional studies **Modelling:**

- > How to select a (generally available) model?
- > Use of lag fase in model?
- > Differences between models

Growth Model

[Static | Dynamic]

0.00

120.00

120.10

240.00

240.10

300.00

Time(h) Temp (°C)

7.00

7.00

9.00

9.00

12.00

12.00

[Add prediction]



IAFP webinar Challenge Testing 13-9-2019



How to select a (generally available) model?

- > FSSP, Combase, PMP, Symprevious,....
- Representative for the product Parameters in the model (a_w versus salt + dry matter content)
- Misuse of models (working outside their limits)
- > Use of confidence intervals in the interpretation?

 > Use of models for composite food products (interaction between components)



Multistate outbreak of Listeria monocytogenes infections linked to whole apples used in commercially produced, prepackaged caramel apples: United States, 2014-2015.

 $\underline{\text{Angelo KM}^{1}, \text{Conrad AR}^{1}, \underline{\text{Saupe A}^{2}, \underline{\text{Dragoo H}^{3}, \underline{\text{West N}^{4}, \underline{\text{Sorenson A}^{5}, \underline{\text{Barnes A}^{6}, \underline{\text{Doyle M}}^{7}, \underline{\text{Beal J}^{7}, \underline{\text{Jackson KA}^{1}, \underline{\text{Stroika S}^{1}, \underline{\text{Tarr C}^{1}, \underline{\text{Kucerov}}, \underline{S}^{1}, \underline{\text{Gould LH}^{1}, \underline{\text{Wise M}^{1}, \underline{\text{Jackson BR}^{1}}. } } } }$

Author information

Abstract

Whole apples have not been previously implicated in outbreaks of foodborne bacterial illness. We investigated a nationwide listerio



Use of lag fase in model?

- Guidance document does not prohibit the use of a lagphase, but what is realistic?
- The lag-phase default value in Combase is not directly linked to stress conditions.
- Authorities in NL prohibit use of lag-phase in models.





Differences between predictions

- Different models will give different predictions.
- > What is the truth?
- FBO will try to use the most favourable model.
- > Use different models!!!





Conclusion

- > Performing a study is complex
- Challenge testing involves various areas of experitise
- Knowlegde for the evaluation of studies is not widely available at the Competent Authorities due to its complexity

Modelling seems an easy solution but has limitations.

Carefully plan a study

Questions?

Questions should be submitted to the presenters during the presentation via the **Questions section** at the right of the screen.

Slides and a recording of this webinar will be available for access by IAFP members at <u>www.foodprotection.org</u> within one week.

