

Risk-Based Approaches to Sanitation in Dry Processing Environments

Moderator: Jennifer Acuff, University of Arkansas



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Todays Panelists

Abby Snyder - Cornell University

Karl Thorson - General Mills

Nathan Mirdamadi – Kerry

Jennifer Acuff, Moderator – University of Arkansas

Risk-based approaches to sanitation in dry processing environments: Contamination and Control

Jennifer C. Acuff, Ph.D. Assistant Professor of Food Microbiology and Safety, Department of Food Science



University of Arkansas System





"Known or Reasonably Foreseeable Hazards"

- Salmonella spp.
- Cronobacter spp.
- Other foodborne pathogens may also contaminate through the environment or be naturally present on ingredients





External Contamination Routes

- Raw ingredients
- Facility design and upkeep
- Employees and pests



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Funk, J. (2007). Moisture led to Salmonella outbreak. USA Today, 4(5), 2007.

Podolak, R., Enache, E., et al. (2010). Sources and risk factors for contamination, survival, persistence, and heat resistance of *Salmonella* in low-moisture foods. *J Food Prot*, 73(10), 1919-1936.

Internal Contamination Routes





Zoning

- Employee entrance/exit crossing wet/dry areas
- Poorly sectioned areas for wet cleaning
- GMPs and Equipment Design
 - Condensation collection
 - Leaky and motion activated sinks
- Insufficient cleaning and sanitation
- Cross-contamination



CDC, 2012. Multistate Outbreak of *Salmonella* Bredeney Infections Linked to Peanut Butter Manufactured By Sunland, Inc. (Final Update) Podolak, R., Enache, E., et al. (2010). Sources and risk factors for contamination, survival, persistence, and heat resistance of *Salmonella* in low-moisture foods. *J Food Prot*, 73(10), 1919-1936.

Sanitation Preventive Controls LMF Remix

- Identifying the hazard that will occur if a preventive control is not in place when
 - Environmental contamination could occur prior to packaging
 - Severity of illness is extreme
- Ask all the questions (go down the rabbit hole)
 - Flow of product and employees
 - Equipment maintenance, repair, wear and tear
- Cleaning and sanitation with defined procedure, frequency, monitoring and verification activities, and records
- Preventive control must be:
 - validated (prove reduction or elimination of the hazard) and
 - verified (prove that it is being performed correctly).





https://www.claudialamoreaux.com/rabbit-hole-this-way/



Sanitation Preventive Controls Tools

- Strengthening cGMPs and SSOPs already in place
- Environmental monitoring to "seek and destroy" or "seek and control"
- Corrective actions
 - Plan what you'll do when you get a positive
 - ▶ Be ready to *change* something to prevent it in the future
- Flexibility be prepared to reevaluate and adjust (follow the clues left by the organisms)





https://cjwerlinger.wordpress.com/tag/national-treasure/



Research that supports optimizing riskbased approaches to dry sanitation



Abby Snyder, PhD Associate Professor snyder@cornell.edu

Risk-Benefit Tradeoffs

Sanitation



Risk-Benefit Tradeoffs



Risk-Benefit Tradeoffs



Sanitatio

- Wet Cleaning

Wet

Sanitatio

Washing with water and detergent

Wet Sanitizing

- 🛛 Aqueous chemical sanitizer

There are tradeoffs associated with wet sanitation in LMF facilities.

Dry Cleaning

Brushing, Wiping, Scraping, Sweeping

□Vacuuming

Material Flush

Dry Sanitizing

Hot Oil Flush

Heat

Gaseous Chemical Sanitizers

Alcohol Wipes

Moisture elevates risk in dry processing environments

• Dry processing environments pose unique challenges for environmental cleaning and sanitation. Introducing water leads to microbial growth and



Wet sanitation in dry facilities significantly raises environmental relative humidity up to100% RH



Unpublished Data (Slaughter et al., 2025)

Humidity changes the evaporation kinetics of surface moisture

33% RH = Low Moisture Retention

97% RH = High Moisture Retention



Unpublished Data (Slaughter, Chuang, McLandsborough, and Snyder, 2025)

Preliminary Results: Humidity impacts Salmonella Growth on Soiled Surfaces

- > 4-log increase in CFU within 48 h of inoculation of PIF soiled coupons at 97% RH.
- > 1-log increase in CFU within 48 h of inoculation of PIF soiled coupons at 81% RH.
- Reduction in Log(CFU) occurred after 72 h at 81% RH, but not at 97% RH
- High relative humidities and condensation created by wet sanitation have the potential to support the growth of pathogens on insufficiently cleaned and sanitized food contact surfaces.



Unpublished Data (Slaughter et al., 2025)

Application method affects the efficacy of sanitizers



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Considerations for sanitizing

- Sanitizers are bactericidal and effective at killing vegetative pathogens.
- Bench-scale efficacy tests do not provide evidence of real-world risk reduction. *Sanitation efficacy is hard to study*.

• Microbial reduction comes from both cleaning and sanitizing.



Microbial reduction from dry physical cleaning



Simulated Production Campaign

- 30,000 kg of milk powder processed in one production run.
- Milk powder is packaged in 300 g consumer-sized units.
- 100,000 milk powder units are produced in one production run.
- For a given scenario, 1,000 production runs are simulated.
- Initial contamination levels: 100, 10,000, or 1,000,000 cells of *Salmonella*.



Illustration by Celeste Withiam



Daeschel et al., 2025. Applied Environmental Microbiology. Available here:

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Scenario 1: How does a surface contaminated with Salmonella crosscontaminate milk powder?



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Scenario 1: How does a surface contaminated with Salmonella crosscontaminate milk powder?



| Recalled Product Details | Organism | Reported Contamination Concentration | Contamination Concentration (Log CFU/g) or (Log MPN/g) | Reference |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------|--------------------------------------------------------------------|------------------------------------------|
| -Recalled Powdered Infant Formula (PIF) -Produced in January 2007 -22,000 kg batch was recalled -Product packages contained two 400g bags | Cronobacter spp. | -2.78 Log CFU/g | -2.78 Log CFU/g | (Jongenburger et al. 2011) |
| -Recalled PIF -Produced in 1985 -PIF was packaged in 25kg bags. | <i>Salmonella</i> Ealing | 1-6 CFU/450g | -2.65 to -1.87 Log CFU/g | <u>(Rowe et al.</u> <u>1987)</u> |
| -Recalled wheat flour -Produced in 2016 -1kg and 10kg bags | <i>E. coli</i> O121 | 0.15 to 0.43 MPN/100g | -2.82 to -2.37 Log MPN/g | <u>(Gill et al.</u> 2019) |
| -Recalled raw wheat flour used in baking mix. -Produced in 2008 | <i>Salmonella</i> Thyphimurium | 0.0036 to 0.024 MPN/g | -2.44 to -1.62 Log MPN/g | (<u>McCallum et</u> <u>al. 2013)</u> |

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How do cleaning interventions reduce the prevalence and concentration of *Salmonella* contamination?



Scenario 1: How Salmonella contaminates sequential units produced during production.



The n-th Product Unit in Simulated Production Run

1st unit produced after 6 log contamination breach: 100 CFU/g





500th unit produced after 6 log contamination breach: 1 CFU/g

Scenario 2: Product Flushing



Where do we go from here?

- We are working with the industry to conduct studies that:
 - Establish a process to identify the most problematic niches in a processing line.
 - Demonstrate how to quantify microbial reduction in those niches.
 - Develop a QMRA that can be used to compare outcomes among different sanitation regimens.

Contact Us: snyder@cornell.edu





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CORNELL DRY SANITATION RESEARCH ADVISORY COUNCIL

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FREE Low Moisture Food Safety Series

Food Safety Virtual Office Hours



Food Safety Virtual Office Hours Low-Moisture Food Series

There is a lot of food safety educational content out there, but very little that addresses the unique needs of the low moisture food industry. Low moisture foods like dairy powders, spices, chocolate, nuts, snack foods, and baked goods present distinct food safety challenges that aren't always addressed by conventional food safety information. This webinar series is designed to focus on those nuances and support the industry in advancing more targeted, riskbased strategies for managing food safety in dry environments.

- June 24th 12-1 pm: Supply Chain Food Safety Through Disruption
- *Speakers:* Martin Wiedmann (Cornell), Aaron Adalja (Economist, Cornell), Mark Nisbet (Mars Wrigley) and Hazel Tatosian (Ingredion)
- July 1st 12-1 pm: Process Validation in Low Moisture Foods Reducing the Risk of Failure
- Speakers: Wendy White (Georgia Tech), Kaitlyn Casulli (Risk Busters), Brian Farina (Deibel Labs)
- July 15th 12-1 pm: Allergen Control Programs: Transitioning to Risk-Based Management Systems
- Speakers: Joe Baumert (Nebraska Lincoln), Ben Remington (Nebraska Lincoln), Abby Snyder (Cornell)
- July 23rd 12-1 pm: Product testing methods and schemes for low moisture foods limitations and opportunities
- Speakers: Martin Wiedmann (Cornell), Matt Stasiewicz (Illinois), Pam Wilger (Post), Catharine Carlin (mxns)



https://cals.cornell.edu/institute-for-food-safety/resources/virtual-office-hours



Treat water like glass...the war on water

Is your kitchen "clean"?





Is your kitchen dry?







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The War on Water

- Contamination risk
 - Chemical
 - Physical
 - Microbiological
 - Regulatory

From a microbiological standpoint... Unnecessary water is like gasoline for a fire. Water should be by exception only.





Why is the WOW (War On Water) important?



- Leads to significant microbiological growth in our product environments
 - Pathogens Listeria, Salmonella, etc.
 - Spoilage Yeast, Mold, etc.
- Human safety hazard
 - Chemical usage
 - Slip hazards
- Equipment reliability and function
 - Electrical issues
- Regulatory focus
- Environmental and sustainability goals





Cleaning Method – Order of Preference



- 1. No cleaning needed
 - a. Redundant or dedicated equipment (isolated)
- 2. Purge (next product or inert material)
- 3. Dry clean
- 4. Dry clean w/chemicals
- 5. CIP (Clean in Place)
- 6. Controlled wet clean out of place
 - a. Automated washer
- 7. ACS (Assisted Cleaning System)
- 8. Controlled wet clean in place
- 9. Flood cleaning

Control Water/Moisture



Necessary Water

- Process water
- Wet washing

Minimize/Manage Eliminate/Reduce

Unnecessary Water

- Condensation
- Leaks
 - Ingress
 - Internal
- Drains (leak or back-up)

Fix Root Cause Fix Root Cause Fix Root Cause Fix Root Cause Fix Root Cause

Action plan



- Find it
- Fix it
- Prevent it



Find it



- Water Audit
 - Uncontrolled water
 - Condensation
 - Wet cleaning
 - Leaks
 - Drips
 - Pooling
 - Ice/frost
 - Steam



Fix it



- Corrective action plan
 - Guidance documents
 - Insulate surfaces
 - Heat surfaces
 - Dry air
 - Dry surfaces
 - Seal spaces
 - Ventilate
 - Pressurize spaces
 - Isolate
 - Maintain as sanitary



Prevent It



- Early Management
 - Discuss uncontrolled water risk early and often
- Engineering focus > design it out
 - Facility and system
 - HVAC
 - Plumping

• Develop a Water Control Program

- design
- train
- audit/inspect

Key Takeaways

respond





- Follow the *ranked cleaning method proposal* to minimize the impact of cleaning
- Establish a *risk based framework* to ensure that the appropriate cleaning and sanitation protocols are applied.

Key Learnings



- Clearly define clean expectations to cross functional teams
- Wet/dry zoning is needed
- Component level of disassembly
- If you get it wet, you must fully clean and validate
- If it is dry, keep it dry treat water like glass
- If you wet clean, get it dry quickly, then keep it dry
- Mechanical action is critical focus on low flow areas
- Spend time on the plant floor auditing and reviewing practices
- Visual inspection is <u>everyone's</u> best sanitation tool!



I used to be addicted to soap...

But I'm clean now.



WHAT IS A NICHE

AND THEIR IMPACT ON DRY CLEANING

Nathan Mirdamadi, Global Director of Sanitation

A Growth-led Industry Leader

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Manufacturing locations

Technology and Innovation centres

70+

21,000+ Employees **1,100+** R&D scientists

- SPRAY DRYING
- SEASONS/FLAVORS
 - DRY & LIQUID



Ireland & UK: 24 manufacturing plants, 2 sales offices

OUR CONSUMER...



Our obligation:

- Our customers (& families)
- Our Brands/Businesses



• The BIG Picture of Food Safety

- Leverage existing HD Guidance
 - 3A, NAMI, GMA, EHEDG
- Identify the gaps and develop Periodic Equipment Cleaning (PEC)
 - Determine Foundational vs Priority PEC Tasks





PERFECTION

WHAT IS THE PROBLEM WITH A NICHE?

- A segment of the market
- A place where microorganisms can establish themselves, multiply, and potentially contaminate food



KERR

WHERE DO WE FIND NICHES?



- Pits
- Cracks
- Recesses
- Open seams
- Un-hermetically sealed joints
- Poorly design connections
- Dead ends/legs
- Areas were food/water accumulates







WHO CAN WE BLAME FOR NICHES?



- Maintenance Technicians
- Bean Counters
- Design Engineers
- Food Safety
- Company Culture



WHY ARE NICHES A PROBLEM?



- Ignorance
 - Lack of focus
 - Appreciation (in low-moisture products)
- Poor cost analysis
 - Initial Cost vs Total Cost Ownership
 - Resource vs Materials
 - Assumptions
- Realities of Fabrication & Construction
- USE OF PRESENCE OF WATER
- INCREASES DIFFICULTY OF DRY CLEANING



WHEN ARE NICHES PROBLEMATIC?





HOW DO WE MANAGE AND AVOID THEM?



- Sanitary Design
 - New or Existing Equipment
- Period Equipment Cleaning



DEFINE THE GAP & URGENCY



- Define the Risks
 - Microbiological, Chemical, Physical
 - Public Health, Regulatory, Business
- Determine Ideal Case (End in

Mind Thinking)



THANK YOU

Questions?

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World Food Safety Day is June 7, 2025

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