



**KELLERMAN
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Frozen Dessert Food Safety Case Study and Food Safety Considerations

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Food Safety Case Study Overview

No identifying information is presented due to the sensitivity of the event.

- The product was frozen cakes, made at a facility that processed a new line of frozen ice cream bars
- The facility was Global Food Safety Initiative (GFSI) benchmarked certified and they experienced turnover of key food safety personnel prior to their recertification audit.
- Kellerman Consulting was hired to assist with training of new food safety personnel and preparation for recertification.
- The topics are intended to help frozen dessert facilities to re-evaluate high risk and low risk operational activities.



Background and Root Cause

Disgruntled employee was a whistleblower

The root cause of the issues in the facility:

- Rapid expansion/Insufficient space
- Lack of Food Safety Culture/Inappropriate behavior
- Lack of understanding of the GFSI requirements



Background Context

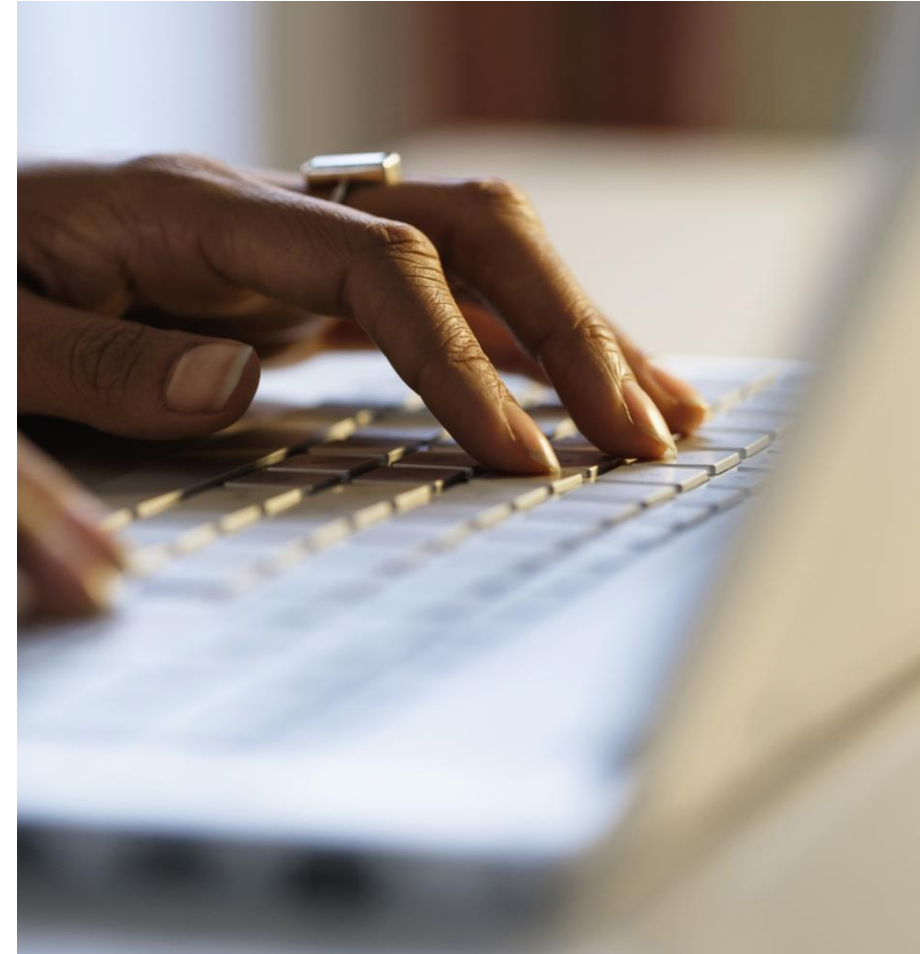
- This multigenerational legacy business produced large quantities of frozen cakes for a well-known retailer
- The GFSI program had been in place for at least a decade

Things to consider:

- Organizational structure was poor
- Facility layout was a root cause
- The certifying body (CB) findings and the resulting revoking of GFSI certification was justified.

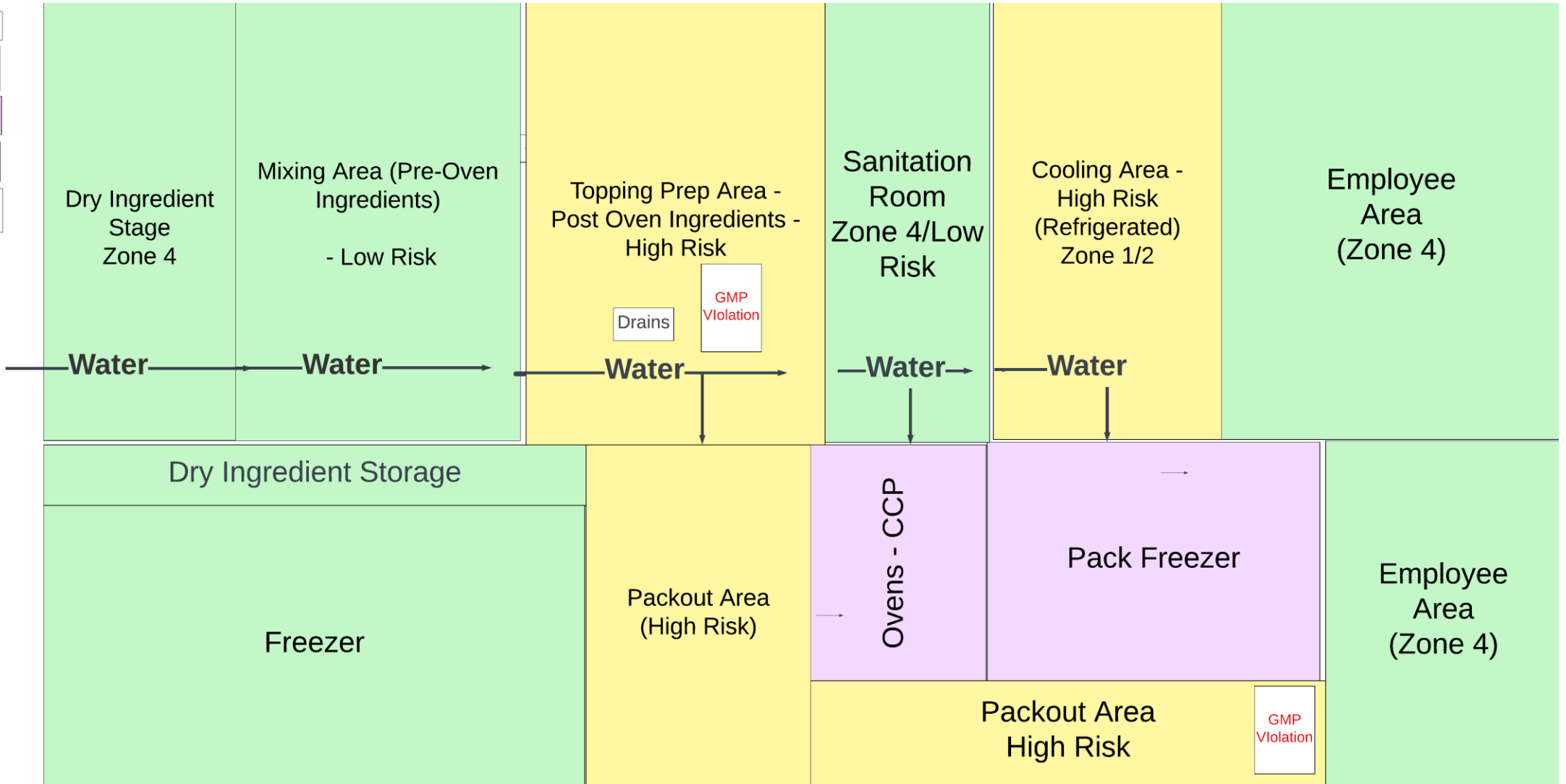
Audit Process and Results

- The facility was given an **unannounced unscored audit**, which created conflict and served as an unstated warning.
- Use of **expired ingredients** was the reason given for the unannounced audit.
- The **expired ingredients were not cited** during the scheduled GFSI audit, which took place several months later.
- During the scheduled GFSI audit **Major/Critical Violations** involved failure to separate functions of High-Risk Activities from Lower Risk Activities.



Map Representation

Key
High Risk
High Care
Low Risk
White = Zone 4



Violations



Critical:

- Employee Hygiene (Supervisor clothing)
- Water Flow (Low risk to high risk)

Major/Minor:

- Use of expired ingredients
- Lot tracking failures for raw ingredients
- Storage of exposed product during packaging

Critical Violations

Limited Space Contributed to Hygiene Violation:

- Employees enter the packaging area from the break room and overflow cooling was next to the entrance.

Food Safety Culture Concerns Contributed to Violation:

- Supervisors were walking through low-risk, high care, and high-risk areas without changing outerwear





Critical Violations

Water and Drain Violations:

- Plumbed water system brought water through the low-risk areas, into the high-risk area
- Drain backup was cited as the potential for critical failure
- It is possible that a risk assessment and careful monitoring could have addressed this, but under the circumstances, that was not considered a viable option

Major/Minor Violations

Use of Expired Ingredients:

- The supplier agreed to extend the shelf life, and apparently would have continued to do so if the requests were made in writing (even repeatedly).
- Use of expired ingredients is arguably not a violation as the ingredient was run through the thermal kill step, however, the whistle blower complaint made this practice catastrophic.



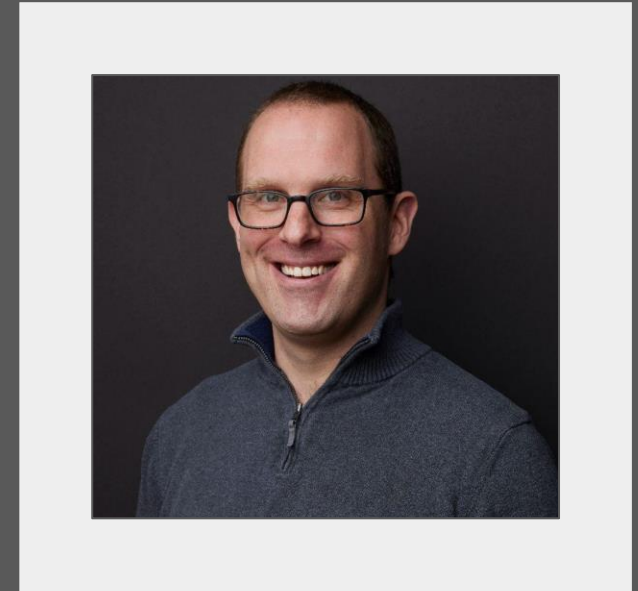
Free Food Safety Training Videos and Downloads

Topics Include:

- Risk Assessment
- Traceability
- Validation and Verification
- Corrective Action & Preventive Action
- Internal Audit
- Food Safety Culture
- Allergens
- Supplier Approval Program
- Environmental Monitoring
- Preventive Maintenance & Repair
- and More!



Q & A



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