BY STEPHENIE OVERMAN

ADDING FOOD PRODUCTS IS A GREAT WAY TO INCREASE CONVENIENCE STORE PROFITS, BUT it brings with it some risks. "If you make a mistake, you could kill somebody," said Tara Paster, president and founder of Paster Training, a private training company dedicated to educating food industry members.

Paster and other food safety experts warn that a foodservice program increases responsibility and liability. Convenience store operators must "understand regulatory and moral obligations."

George Zameska, a certified food safety professional in Philadelphia, agreed. "Some places will say, 'we used to be a gas station, now we've added food' but it's difficult to go from being a mechanic to running a restaurant overnight. It's different selling something for convenience and selling something that can make someone sick."

A lot comes along with adding food items, Zameska said, including pest control problems, spoilage and crosscontamination threats. "Sometimes it's difficult to convey to the independent operator that this is a significant major shift, that somebody has to have all this knowledge," he said.

According to Paster, in the past year food safety has risen higher on the

agenda in the convenience store industry. "I see more convenience store operators being more responsible," she said.

Operators are taking active managerial control of the top risk factors: unsafe suppliers, food not cooked or held to the right temperature, contaminated equipment and poor employee personal hygiene. But managers must continuously monitor the situation and train employees to keep the food chain safe.

### BACK TO THE FIELDS

The supply chain starts in the fields where the food is grown, noted Elizabeth Bugden, a senior training specialist for Paster Training and a food scientist working with the Rhode Island Department of Education to prevent foodborne illness in school children.

Bugden recommended working with farm suppliers that are GAP (Good Agricultural Practices) certified. The GAP certification verifies that a farm

adheres to the U.S. Food and Drug Administration's "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables."

Paster sees greater awareness on the part of suppliers about the need for safely grown and processed food, but she warned that convenience store operators still need to be on guard. She advises to ask suppliers: "What do their inspection reports look like? Will they give you a certificate of guarantee? Will they give you a tour? If you don't see bathrooms for farm workers, you need to question."

She and Bugden both suggested the use of third-party inspectors and recommended dealing with suppliers approved by regulatory agencies such as the FDA and the U.S. Department of Agriculture.

Know the supplier's history, Paster advised. Check to see if it has had many outbreaks or recalls. The Internet can be a good source of information, "but you've got to be careful. There have been hoaxes." She cites the FDA and Centers for Disease Control and Prevention Web sites as reputable sources.

A critical question, according to Paster, is whether the supplier has a Hazard Analysis Critical Control Points (HACCP) plan. It uses a seven-step process to identify likely causes of failure in safe food handling:

- ▶ Identify potentially hazardous foods.
- ▶ Observe those foods throughout the preparation, holding and serving process to identify critical control points.
- ► Establish control procedures and monitor critical points to guarantee safe food handling.
- ► Set up monitoring procedures to maintain control.
- ► Establish corrective actions when monitoring indicates a deviation from an established critical limit.
- ► Create effective record-keeping procedures documenting the HACCP system.
- ► Institute procedures to verify that the HACCP system is working.

### **FACING JUDGE JUDY**

"If a supplier doesn't have a HACCP plan, a written food safety plan, then that's definitely a concern," Paster said. "If you were facing Judge Judy, she would ask if you can prove your food is safe. Without a HACCP plan you can't prove" the proper procedures exist.

Many of the concerns about tainted food have arisen from products imported from other countries. And the FDA has limited resources to track food from overseas, said Paster, who recommended having a representative check on overseas suppliers.

With any supplier, "have it in the agreement up front that you can do unscheduled visits. The last thing you want to see is the dog and pony show. Bad operators can sometimes pull it off, because they know the customer is coming," she said.

The best approach is to start with a scheduled visit to evaluate the operation. Later, surprise the supplier with

an unscheduled visit, Paster said. "They should be welcoming and proud to bring you in — as long as you have identification." Identification is important because every supplier should practice not only food safety, but food defense, which means taking steps to prevent deliberate contamination.

Much of food defense "is simple things — Can anybody walk into the facility? Do visitors have to sign in?... Are suppliers doing background checks on their personnel? Are they training employees to report suspicious activity? It's so much more than just checking hairnets," Paster said, adding, "that's a good place to start though."

Kwik Trip Inc., based in LaCrosse, Wisconsin, conducts its own on-site audits and they "qualify vendors to make sure they are food safe; that they are certified suppliers," according to Jim Bressi, director of food research and development. "We have disqualified a few," Bressi said, adding that the company will work with

# Cloning Concerns

**FOLLOWING YEARS OF UNCERTAINTY,** the FDA announced in January that food from cloned animals and their offspring is safe to eat, paving the way for milk and meat from genetic copies of prized bovine to enter America's food supply.

The FDA's decision puts convenience store operators in the position of deciding whether to sell cloned meat and milk and will force store owners to more definitively track food products through the supply chain.

"It will come down to what consumers are demanding," said Scott Hartman, president of Rutter's Farm Stores in York, Pennsylvania. "Traceability is now a huge factor in the food industry."

Recent polls show a consumer backlash against cloning, leading food industry analysts to predict it is unlikely retailers will sell the products any time soon. A Food Marketing Institute report, "U.S. Grocery Shopper Trends 2007," surveyed 1,160 consumers, and included the question: "How comfortable are you eating food made

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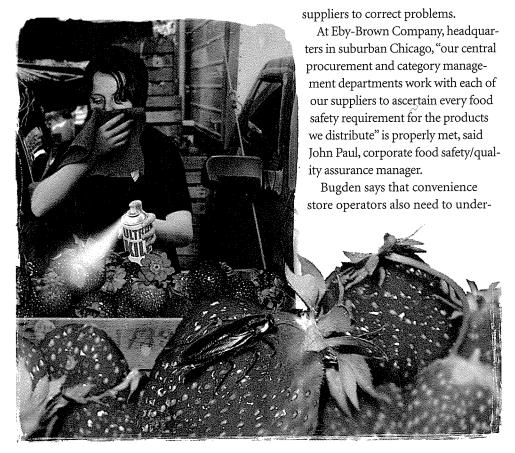
with products such as milk, eggs and meat from a cloned animal?" Only 10 percent of survey respondents said they are "completely comfortable," while 31 percent said they are "not at all comfortable."

The nation's largest convenience store chain, 7-Eleven, is undecided on whether it will sell cloned products, said Margaret Chabris, a spokeswoman for the company. And a number of meat producers and grocers, including Smithfield Foods Inc., Tyson Foods Inc., Hormel Foods Corp., Dean Foods Co. and Whole Foods Market are in line with consumers and have said they do not plan to buy or sell meat or products from cloned animals.

"Cloning is a lightening rod, it has a science-fiction stigma," said Dennis Krause, a food analyst at GE Corporate Lending. "Food providers that offer cloned milk and meat can expect a visceral and emotional reaction."

The FDA's ruling ensures that some cloned meat and milk products will enter the food supply within the next five years, meaning convenience retailers must also decide whether or not to label non-cloned food products. Because FDA scientists found no difference between cloned foods and meat and milk produced the conventional way, the

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stand proper warehousing and inventory management for food products. "Warehouses should rotate inventory. They should have a first in/first out system," she said. A good warehousing system also has "a strong active pest control program" and segregates food products from non-food products.

Bugden and other safety experts also urge operators to understand the code or lot tracing system that can be used to track products in case of problems or recall notices.

For example, Zameska noted, "if there's a complaint that a soda can has mold on it, it could be a store problem, but that type of problem should be referred back to the FDA to follow up with the warehouse or manufacturer. It could be a one in million thing or it could be a process defect affecting multiple stores and supplies in warehouses.

"If you're sloppy, you've set yourself up and everybody else up for problems," he said. The ideal food safety model is one in

agency does not require products derived from clones to be labeled.

Cloning companies oppose any type of labeling, contending that meat and milk products from conventionally bred animals are not required to be labeled. And the FDA has generally reserved mandatory labeling for products that present real risk. But the FDA could respond to public pressure for clone-free labels. The agency may allow those if the claims on the labels can be verified — a difficult bar to clear for clone-free milk, analysts say, because those products are chemically indistinguishable from their clone equivalents.

In a similar situation years ago, the FDA gave in to consumer pressure and allowed special labels on dairy products from animals not treated with recombinant bovine somatotropin (rbST), a hormone that some farmers give their cows to increase milk production.

The nation's two largest producers of cloned cattle — Via-Gen, in Austin, Texas, and Trans Ova Genetics in Sioux Center, Iowa — recently announced the creation of a registry for all farm animal clones and a system for keeping them out of the main-stream food chain. The registry could assist retailers in verifying clone-free animals.

The FDA's announcement effectively lifts the voluntary moratorium on selling clones and their offspring. However, due to consumer and retailer concerns, clones themselves will be withheld from the food supply at the direction of the U.S. Department of Agriculture.

Clio Tipton, president and CEO of the International Dairy Foods Association, said retailers are showing the proper degree of caution. If milk from clones is introduced before consumers have a chance to come to grips with the idea, the result could be reduced consumption, she said.

The FDA concedes that its conclusion about the safety of cloned food is based on the methods clone-makers use today, which the agency admits are likely to change in the future. Therefore, analysts advise that retailers should be proactive and not rely entirely on the food-safety agency to ensure that cloned products will not one day be considered harmful. By also ramping up communication with suppliers, retailers can further increase their education on cloned products.

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which "every item that comes into your hands comes with full documentation."

Each shipment received at an Eby-Brown distribution center is inspected "for product integrity, tampering or visual signs of contamination. This process is verified by our management, and processes and procedures are reviewed on a daily basis," according to Paul.

Most of the food products Eby-Brown distributes can stand at room temperature without spoiling and have been packaged to prevent external environmental contamination, Paul said. For products that require cold storage, "we monitor and continually verify that our freezers are at approximately 10 degrees Fahrenheit or below and our refrigerated coolers are at approximately 40 degrees Fahrenheit or below."

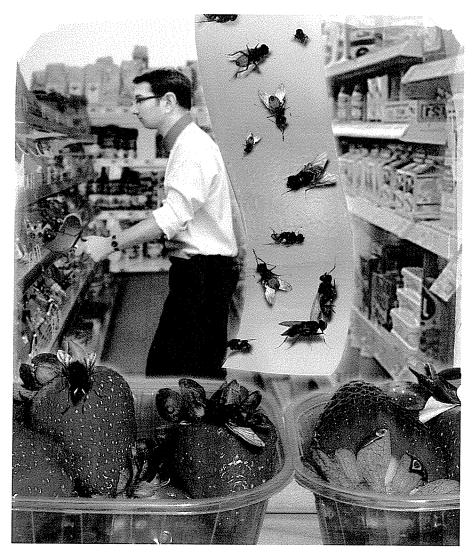
Food orders are processed in a separate assembly area away from non-food storage areas to prevent potential contamination. Employees "double inspect" all products when customers' orders are assembled for delivery.

Delivery drivers are thoroughly trained at each of the distribution centers, Paul continued, "to ensure that proper temperature storage is maintained at all times." Kwik Trip employs its own drivers, Bressi said. "We have two systems — 'fresh' delivery trucks and dry goods trucks so there's no possibility of cross contamination."

### WHEN THE TRUCK ARRIVES

Store employees should be trained to monitor the delivery process, Zameska said. Deliveries "are not always scheduled or met by personnel from the store. It's just 'bring it in, put it over there, sign for it, and off you go.' There's no checksand-balance system in place."

Employees may know to check whether the correct products in the right amount were received, but often they



haven't learned to check for food safety, he said. "Is the food the right temperature? Are there holes in the boxes — have mice been chewing on them?"

Convenience store operators need to know whether food is being delivered in a truck with other types of products, Zameska continued. "Are they practicing storage techniques so if detergent leaks, it's not going to leak onto food? How do they clean up afterward so food isn't contaminated?"

And small lapses can add up.

"A real practical example is milk. You buy milk at the store and see that the sell-by date is good for a week. But a day or two later it's spoiled. Why did it spoil in two days when it usually lasts the whole week? Probably because it was abused in the delivery process. Maybe it sat on the delivery dock and got too warm."

Or perhaps the driver left the truck

door open. "If you're the person getting the first delivery, that's not a problem. But if you're the last on the run, your food may not be refrigerated" anymore, Zameska said.

He added that most in-store dairy cases do not actually cool food. "They're not designed to bring the temperature down. It might take two or three days to lower the temperature" back to the correct level.

Employees also should be instructed to pay close attention to spoilage dates.

### **HANDS-ON TRAINING**

Once the food is in the store, employees must be trained to keep it safe until it reaches the hands of the customers — and hands are quite often the problem. One of the biggest threats to food safety is improper employee hand washing, according to a 2006 FDA report on

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"Reducing Foodborne Illness Risk Factors in Food Service and Retail Establishments."

Poor hygiene and improper food holding time and temperature are the other major threats, according to the report.

More food preparation is being done on site, but many convenience store operations are still geared to handle only packaged food. Budgen recommended that stores maintain a basic daily checklist of good hygiene practices and establish procedures to prevent sick employees from handling food.

The *NACS Foodservice Guidebook* lists the five factors that are known to cause 80 percent of foodborne illnesses:

- 1. Improper cooling
- 2. Advanced preparation (in excess of 12 hours)
- 3. Infected persons
- 4. Inadequate reheating
- 5. Improper hot holding

Bugden said store employees should be educated to adhere to "the Bible" — the FDA's Model Food Code, a food safety guideline on temperatures for cooking and storing meat, poultry, pork, eggs and fish.

Food defense is yet another area where store employees need training. "Make sure nobody comes in and contaminates the food in the store. We train employees to look out for suspicious people, to check if packages have

been opened," Bugden said. Logs of all training should be kept, she added, as a record in case there is an incident.

Training hourly store employees to handle food safely frequently occurs on the job. Make that training interactive with games and involve employees in team-related safety activities, suggested Jeff Nelken, a food safety expert in Woodland Hills, California.

Continuously follow up on training. "When you go back after nine months, they've forgotten," Nelken said. Maintain a real culture of food safety so that "it's not just the flavor-of-the-month program."

Experts say food safety training boils down to a three-step process. First, the trainer describes to the employee what is being done as the trainer practices the correct procedure. Then the employee follows the procedure as the trainer describes what should be done. Then the employee follows the procedure again and explains the correct procedure as they do so.

Kwik Trip provides plenty of employee training, Bressi said, because poor employee hygiene "is definitely the number one threat that we've identified to food safety. We've certified all our store leaders in food safety. That comes at a cost to us, but it's worth it."

All these efforts to keep the food supply chain safe are worth it, according to Zameska, because the store's livelihood and reputation are on the line.

"When you and I buy something, all we see is the package. We're trusting that the right things happened to it before we buy it," he said. But whatever has happened to that product along the way "you're going to blame where you bought it from." O

Stephenie Overman is a freelance writer who specializes in workplace issues. The *NACS Foodservice Guidebook* developed by NACS and Technomic Inc., includes a section on food safety. To order a copy, call (800) 966-NACS (6227).

## Off the Shelves

**PUTTING MORE FOOD PRODUCTS** on the shelves also means running the risk of having to take them off again because of recalls.

The FDA oversees most domestic and imported food sold in interstate commerce. The exceptions — meat, poultry and processed egg products — are handled by the Food Safety and Inspection Service (FSIS), part of the U.S. Department of Agriculture.

Both FDA and FSIS do keep consumers and companies posted at www.recalls. gov/food.html. And both agencies offer free e-mail subscription services that alert recalls:

- FDA: service.govdelivery.com/service/ subscribe.html?code=USFDA\_48
- FSIS: www.fsis.usda.gov/news\_&\_ events/Email\_Subscription/index.asp

After a recall, the FSIS "conducts effectiveness checks," said spokesperson Amanda Eamich. "We visit a number of facilities to make sure they were properly notified. We verify that the company is notifying their customer. The primary concern is getting these products out of the consumer channel."

John N. Paul, corporate food safety/ quality assurance manager for Eby-Brown, explained how thoroughly his company deals with recalls: "Our procurement department works very closely with our suppliers and are notified when products are recalled and/or withdrawn from the market."

When there is a recall, "Our sales department immediately notifies our customers and makes arrangements for the withdrawal of the product."

At the same time, he said the company conducts an internal investigation "of computer records, visual counts, etc., to determine the exact amount of product at each location and to make arrangements for the withdrawal of the product."