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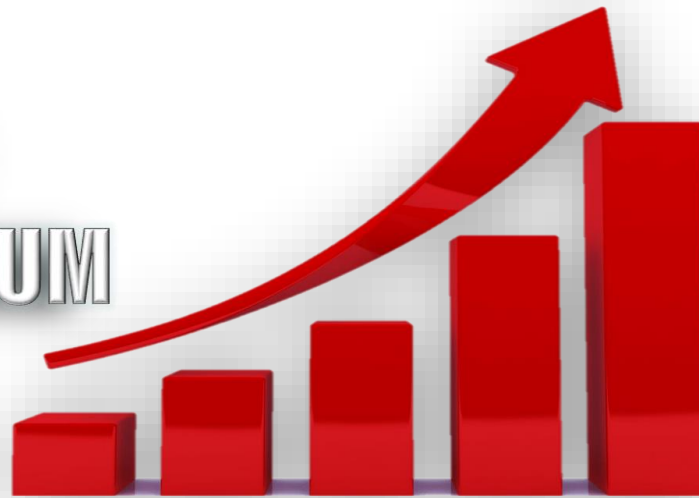
When the Government Comes Knocking: How Pathogens in a Food Facility Can Lead to Criminal Charges



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WHAT IS THE RISK THAT YOUR COMPANY WILL BE INVOLVED IN A RECALL IN THE NEXT 24 MONTHS?

- HIGH
- MEDIUM
- LOW



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THE THEME OF EVOLVING INDUSTRY EXPOSURE



THE FOOD SAFETY REVOLUTION



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NEW FOOD SAFETY STANDARDS



Handling Instructions

Product from inspected and passed meat and/ products may contain bacteria that could be harmful if mishandled or cooked improperly. Please follow these safe handling instructions.

Keep raw or frozen.
Do not cook in a slow cooker or microwave.

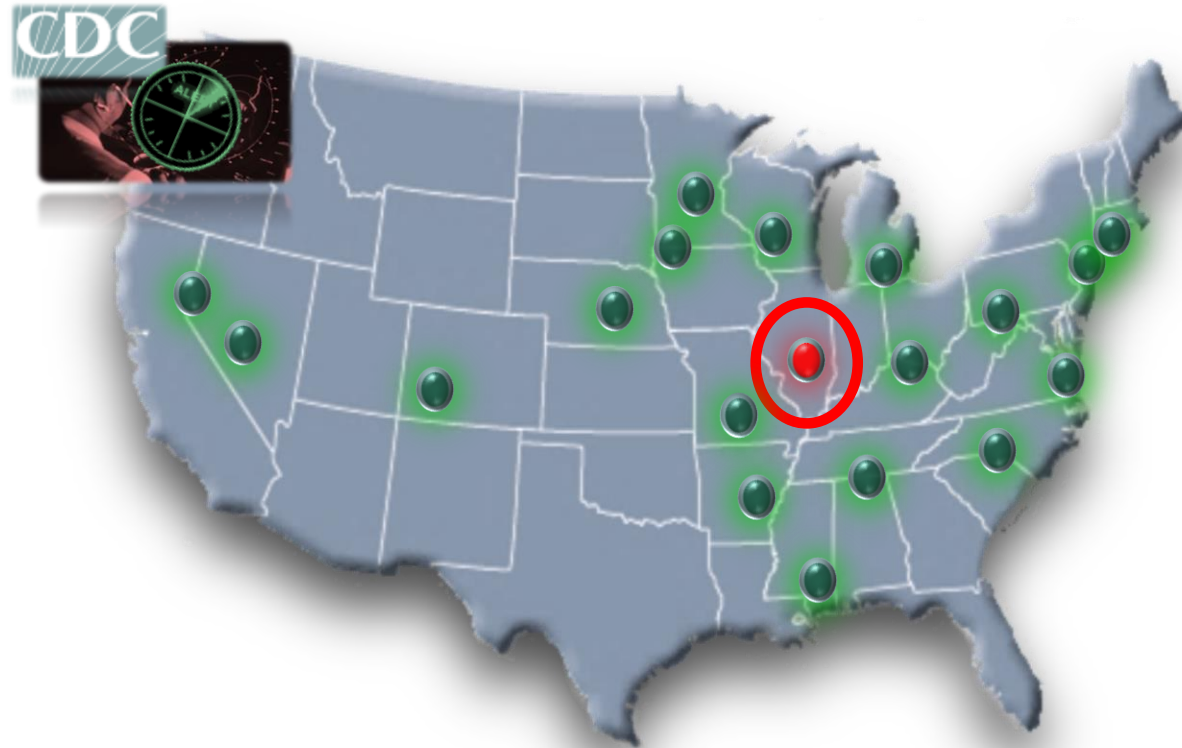
Keep raw poultry separate from other foods.
Clean surfaces (including cutting boards), hands, and utensils after touching raw meat or poultry.

Refrigerate leftovers.
Use within 3-4 days.



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MANDATORY REPORTING AND PULSENET



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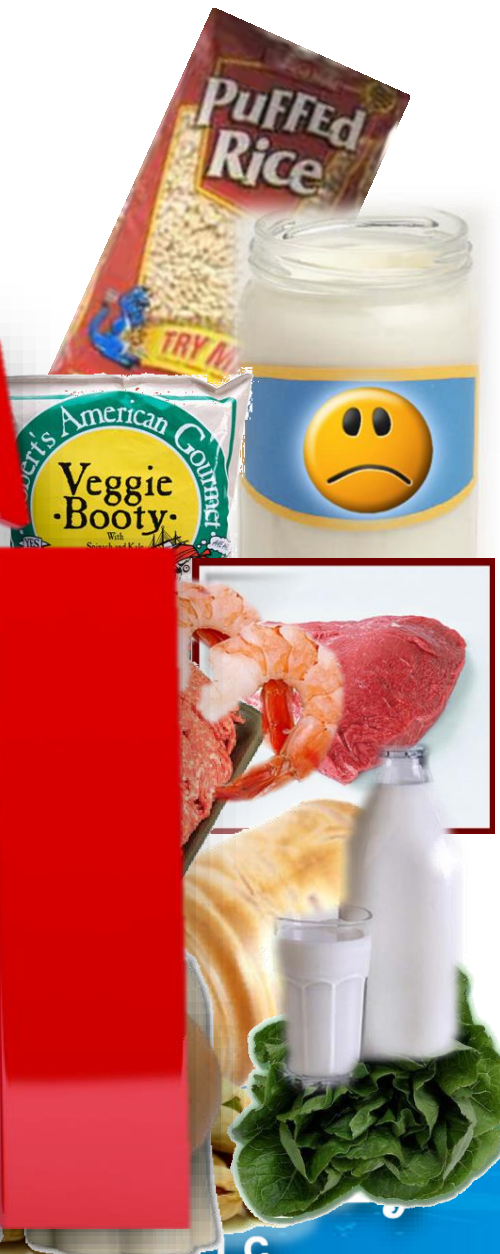
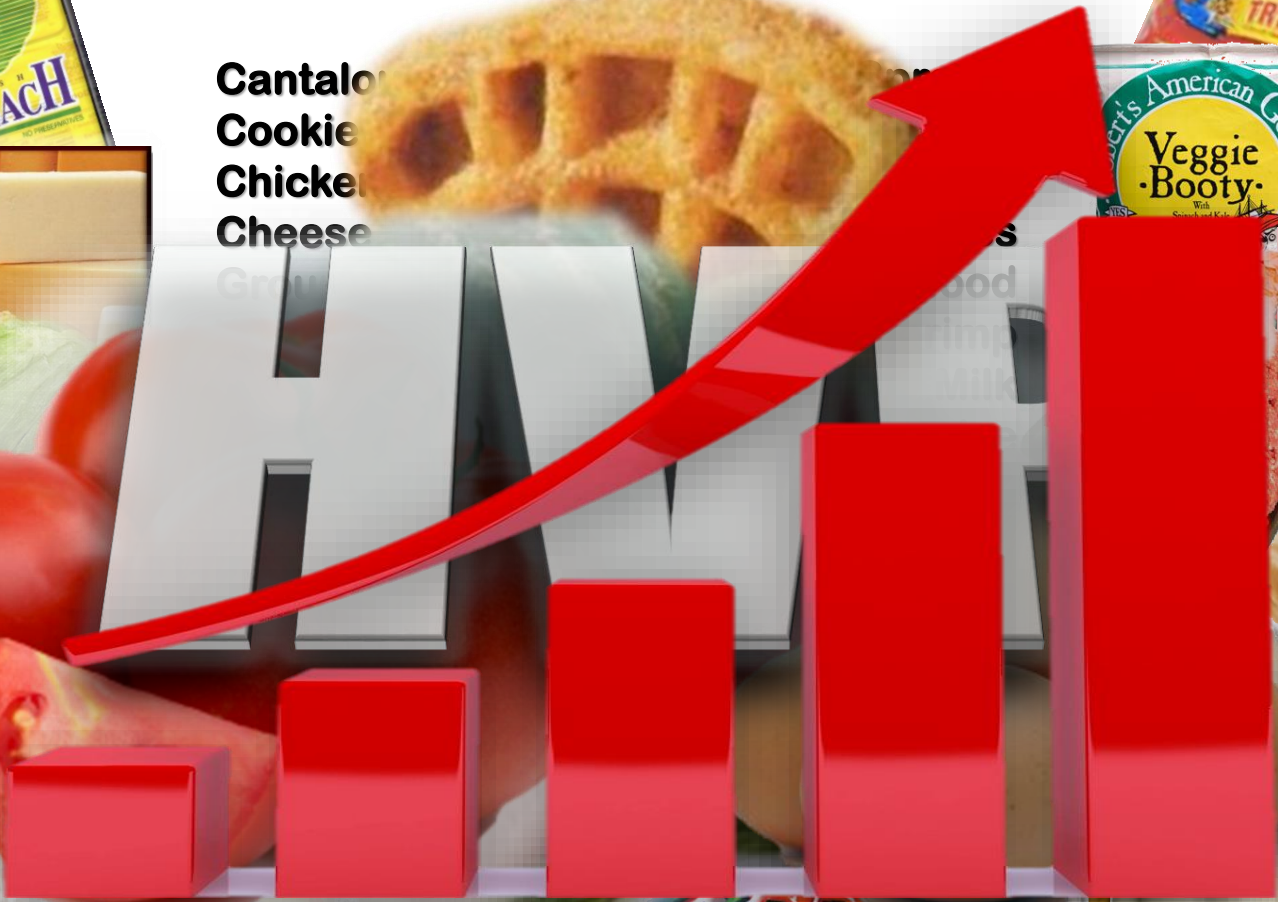
REPORTABLE FOOD REGISTRY



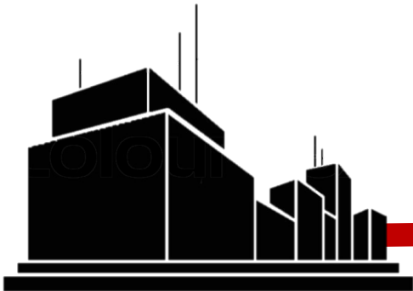
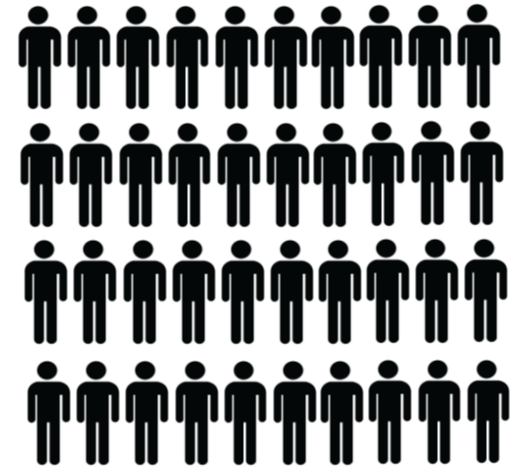
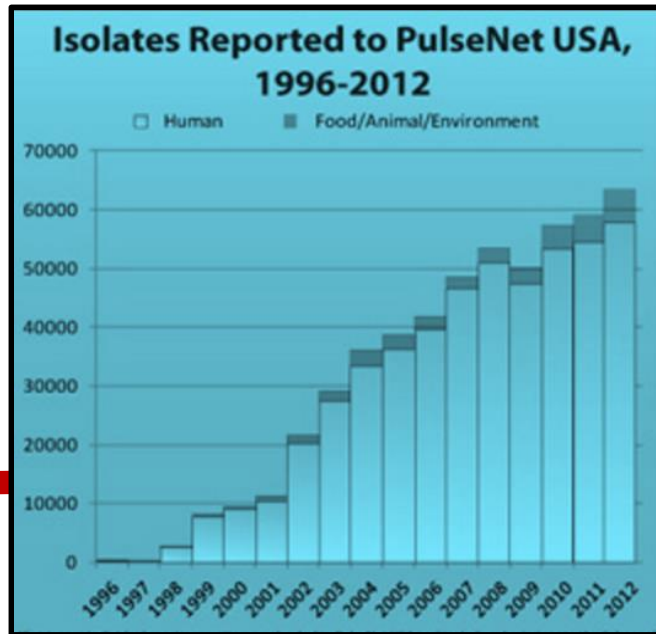
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THE AGE OF THE RECALL

Cantaloupe
Cookie
Chickpea
Cheese



>1,000,000 UNSOLVED ILLNESSES



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THE GOVERNMENT'S RESPONSE



OVERHAUL THE SAFETY OF THE U.S. FOOD SUPPLY



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FOOD SAFETY MODERNIZATION ACT

RULES AND REGULATIONS



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THE WAR ON PATHOGENS



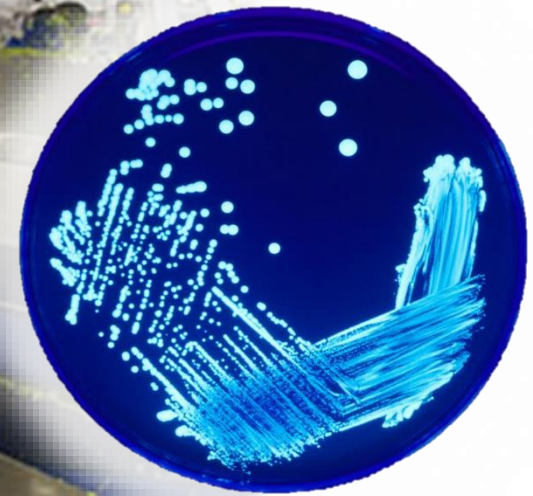
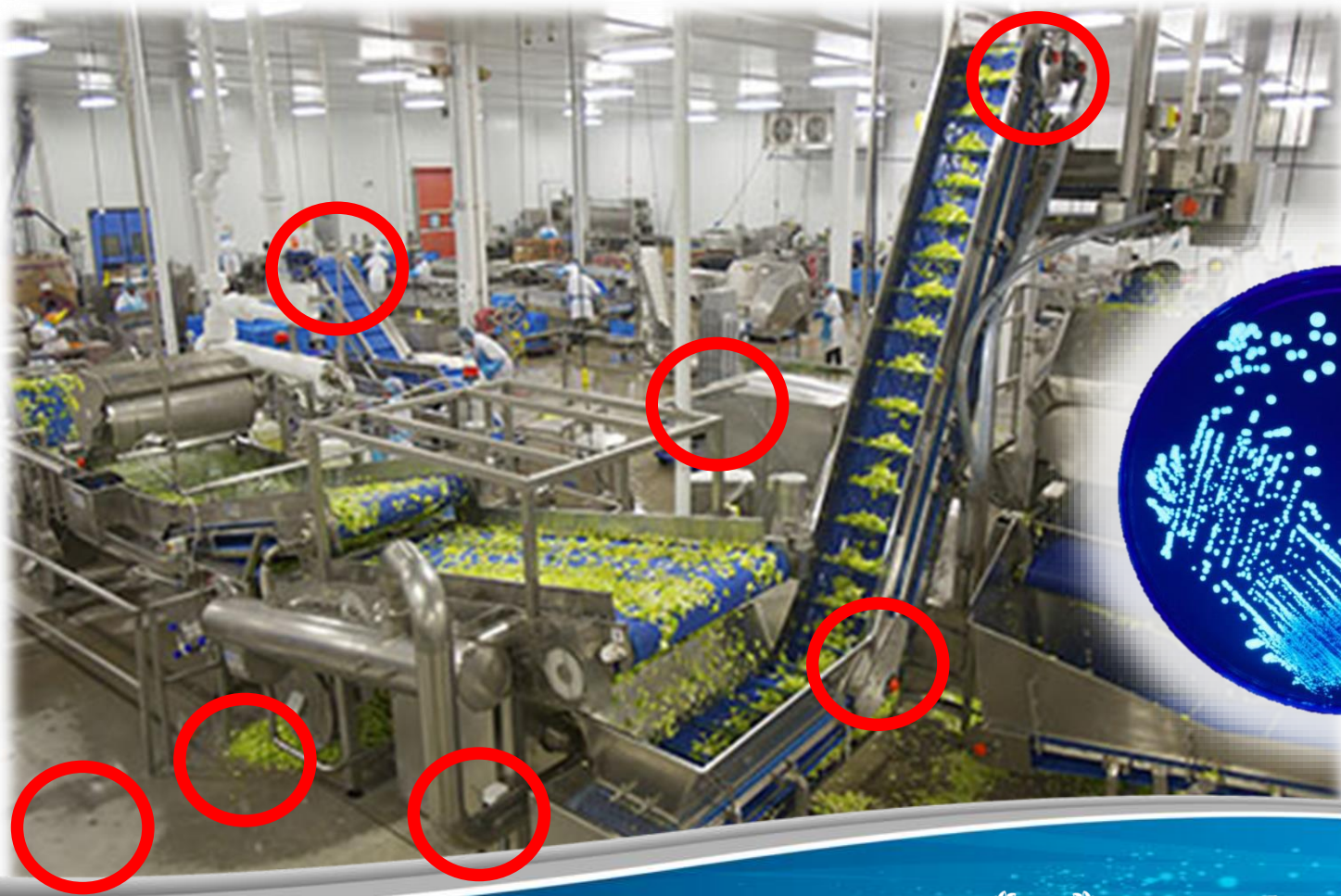
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THE HUMAN ILLNESS STANDARD



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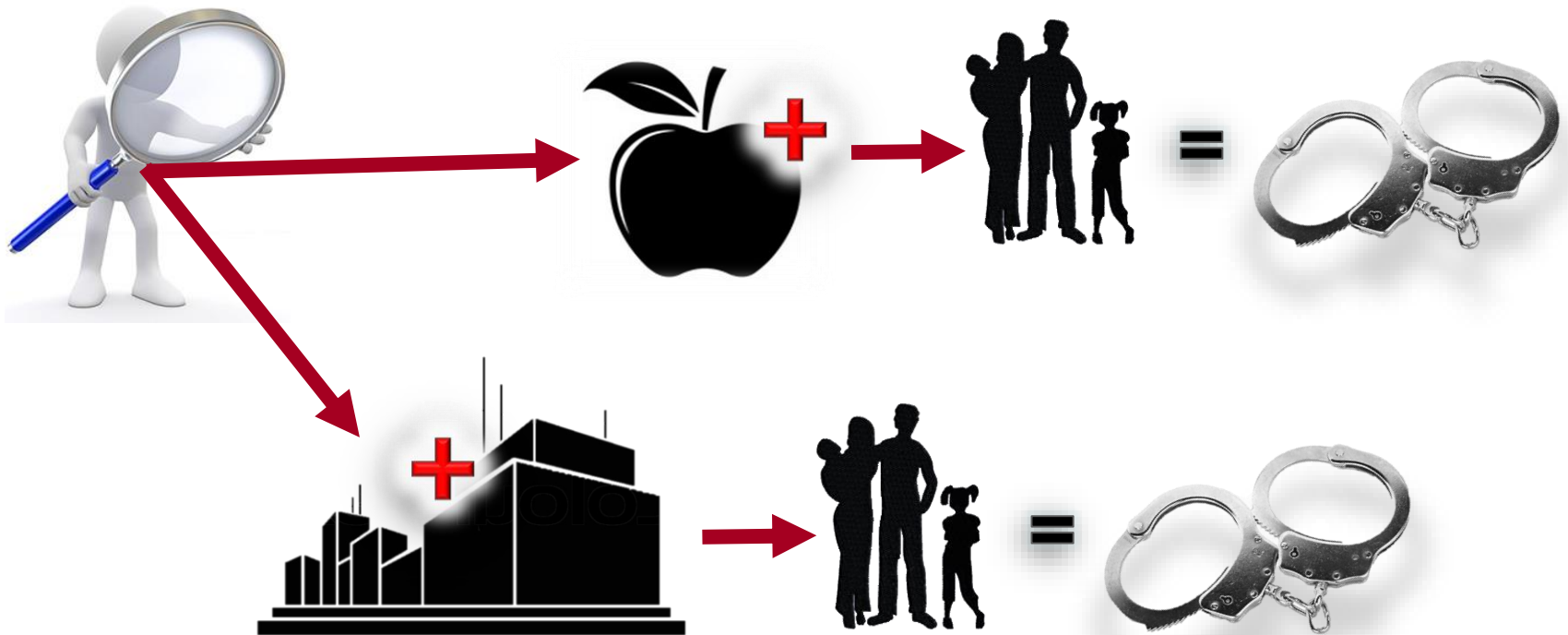
THE FDA "SWAB-A-THON"



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY



NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY

PARK DOCTRINE



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY

PARK DOCTRINE

- (1) You are aware of a condition that could lead to product contamination;
- (2) you are in a position to correct or eliminate the condition; and
- (3) you fail to correct or eliminate the condition.

**MISDEMEANOR
CHARGE**



**\$250,000
1 YEAR IN PRISON**



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY

WHAT MATTERS MOST TO FDA / DOJ?



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY

WHAT MATTERS MOST TO FDA / DOJ?



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NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY



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NEW CONSEQUENCES FOR NONCOMPLIANCE

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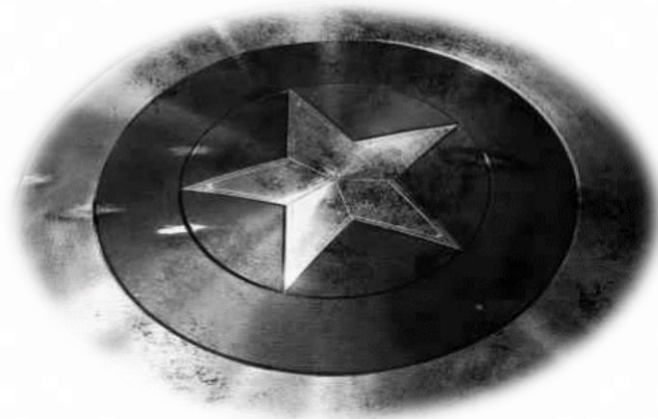
NEW CONSEQUENCES FOR NONCOMPLIANCE

PERSONAL LIABILITY



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WHAT CAN INDUSTRY DO TO PROTECT ITSELF?



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“PLAY FDA FOR A DAY”
CONDUCT MICROBIOLOGICAL PROFILING
OF ZONE 3 AND ZONE 4 AREAS



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KNOW ITS SUPPLIERS



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KNOW ITSELF



HOW ARE YOU SAMPLING?
WHEN ARE YOU SAMPLING?
WHERE ARE YOU SAMPLING?



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KNOW ITSELF



“ROOT CAUSE” v. “ROOT SOURCE”



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REVIEW THE FDA INSPECTION CHECKLIST



SUPPLIER CONTRACTS AND RECALL INSURANCE



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READY TO EAT



READY TO PREPARE



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RECONDITIONING



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WORDS TO LIVE BY

WHAT WOULD 12 JURORS THINK?



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