



Top 10 Most Common Food Safety Mistakes in Bakery



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Introduction

Stacey Brown

- Lead SQF Auditor & Consultant (ASI)
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- Experience:
 - PCQI & HACCP Certified
 - Masters Degree in Food Science from Kansas State
 - Product Designer (Nestle R&D)
 - Innovation & Bakery Tech Consultant (King's Hawaiian)
 - Senior Research Scientist (Pepperidge Farm)



Agenda

- Importance of Food Safety
- Top 10 Common Mistakes & How to Prevent
- Summary
- Q&A



Importance of Food Safety

- Protect Consumers
 - Don't make anyone sick or worse
 - Prevents recalls
- Protect Business & Employees
 - Protects employee's jobs
 - Protects brand and image
 - Reduces loss and increases profitability
 - Enhances product quality
 - Regulatory Compliance



Top 10 Common Mistakes

- Data is pulled from Kiwa-ASI and Various Scheme Owners
- Data includes both inspections (2nd & 3rd party) and GFSI certifications
- Data includes announced and unannounced audits
- Non-Conformances are grouped together by categories
- Observations from sites I have audited or been a consultant for.



Foundational Issues

Understanding
the Requirements



Poorly written or
no written policy



Poorly written or
no written
procedures “SOP”



Inadequate
Training



Procedure Issues

Sanitation

Allergen
Management

Environmental
Monitoring

Storage of
Materials

Pest Control

Internal
Audits

1. Understanding the Requirements

Issue: Sites don't understand the language of FSMA and GFSI programs

Common Non-Conformances

- Nonexistent policies
- The written policy is not relevant to the site
- Improper implementation of policies and procedures



1. Understanding the Requirements

How to Prevent

- Education
 - Extension services
 - GFIS and CB provided training
 - Free training – Consult Google
 - Networking
 - IFSQN (International Food Safety & Quality Network)
- Hire a food safety consultant and collaborate with them to a rewrite/update your food safety plan and program



1. Understanding the Requirements

Two Key Definitions:

Policy - A precise statement which contains the set of principles acting as guidelines for achieving the goals of an organization.

- WHAT we do
- WHO responsible for the overall program
- HOW we determine if we are meeting goals

Procedure – A systematic sequence for an activity or task which is predefined by an organization.

- HOW we do thing specific to manufacturing process (frequency, tasks etc)
- WHO does them
- WHEN we do them
- WHAT methods do we used to complete the process



2. Poorly Written or No Written Policy

Issue

Policies are not detailed to the site

Common Non-Conformances

- Nonexistent policies
- Cut and Paste of the Code – no details
- “Frankenstein” Policy



2. Poorly Written or No Written Policy

How to Prevent

- Detail your policies:
 - Who is involved in developing or executing a plan or task
 - When will it be executed
 - How will it be executed
 - What is the documentation and follow up
- Collaborate with a food safety consultant to write your food safety plan
- Have employees read the policy and note things they don't understand.



3. Poorly Written or No Written Procedures

Issue

There are no written SOP's for task, the SOP is vague and/or the SOP does not correspond to how it is executed.

Common Non-Conformances

- There are no written SOP's
- SOP's are not detailed
- SOP's do not reflect the task.

3. Poorly Written or No Written Procedures

How to prevent

- Observe and document
- Include photos
- Have multiple reviews of employees executing the SOP before finalizing



4. Training

Issue

Staff is not adequately training on food safety requirements or tasks.

Common Non-Conformances

- Missing or incomplete training records
- Onboard training not provided or provided well after employee started on the production floor
- No verification of employee competence after training is complete
- No refresher training



4. Training

How to Prevent

- Implement clear training requirements and training matrix
 - Who should be trained in what?
 - Not just the “How” – Employees need to know the “Why”
- Ongoing refresher training
 - 30-60-90 day reviews including quizzes and verbal questioning
 - At the minimum once per year
- Reinforce training topics during preoperational meeting
 - Pop quiz
 - Visual aids
 - Topic of the month
 - One point lesson
- Test competency during meeting or while conducting internal audits



5. Cleaning & Sanitation

Issue

Inadequate cleaning and sanitation of equipment, storage areas, and other areas of the facility.

Common Non-Conformances

- Unclean premises, equipment, or utensils
- Pre-Operation checks are not completed or there is missing information
- Master cleaning and sanitation schedule not being followed
- Master cleaning and sanitation schedule not comprehensive
- Cross-contact between raw and RTE, allergen and non allergen containing products.



5. Cleaning & Sanitation

How to Prevent

- Clean your facility!
- Create a comprehensive Master Cleaning & Sanitation Schedule
 - Daily, weekly, monthly, annually
 - Include ALL areas of the facility (walls, ceilings, storage etc)
- Create specific detailed SSOPs
- Verify cleaning using ATP not just visual inspections



6. Allergen Management

Issue

Allergens are not properly stored or segregated from non allergen material.

Common Non-Conformances

- Employees don't know all allergen materials used in their facility
- Employees don't know there ARE allergens at the site
- Allergens are not stored properly
- Not testing for allergen removal after processing (part of sanitation)



6. Allergen Management

How to Prevent

- Color coding of allergen containing materials at receiving and in storage
- Dedicated storage of allergens, and a minimum, store on the lowest level of racking
- Visual aids to remind people of the allergens used on site
- Remind employees at the preoperational meeting what allergens are being used on the line that day.
- Verify allergen removal after sanitation



7. Environmental Monitoring

Issue

Environmental monitoring is not conducted or adequate for the site.

Common Non-Conformances

- A risk assessment hasn't been completed
- A detailed SOP for conducting EM is not in place
- Incorrect Indicator Organism not tested
- Frequency of testing is not based on data
- Staff are not adequately trained to conduct EM



7. Environmental Monitoring

How to Prevent

- Complete a risk analysis
- Cover all areas of the site (Zones 1-4)
- Know the indicator organism risks to your site
- Collect data and make decision based on it.



8. Pest Management

Issue

Facility is not adequately pest proof

Common Non-Conformances

- There is no pest control policy
- Presence or evidence of pests
- Pest entry points
 - Doors left open
 - Holes in screens
 - Missing seals and door sweeps
- Missing, damaged or moved bait stations
- No follow up on pest sightings or recommendations from pest control provider



8. Pest Management

How to Prevent

- Walk with pest control provider during inspections and check pest control map/ask questions
- Implement corrective actions and recommendations from pest control provider
- Include pest inspection with your internal audits

9. Storage of materials

Issue

Raw materials, finished goods and chemicals are not stored properly. This can lead to microbial growth, cross contamination and/or stock rotation (FIFO/FEFO) not being followed.

Common Non-Conformances

- Inadequate space for storage
- Cold storage temperature is out of spec
- No monitoring of cold storage temperature control devices
- Allergen products/raw materials are not stored correctly
- Finished products and/or raw materials are stored directly on the ground
- Not following FIFO/FEFO stock rotations



9. Storage of Materials

How to Prevent

- Don't overfill your storage area – 12-18 inches between racks/pallets
- Don't stack pallets too high
- Store allergen products/raw materials together and away from WIP and finished products.
- Coolers/Freezers: Install temperature monitoring devices which auto notify if out of spec ranges
- Follow FIFO/FEFO best practices for stock rotation
- Keep storage areas clean



10. Internal Audits

Issue

Sites are not conducting comprehensive inspections of their facility

Common Non-Conformances

- Employees conducting inspections are not qualified
- Checklists are “pen whipped” and lack details
- NC are not issued CAPA’s and therefore are not resolved



10. Internal Audits

How to Prevent

- Train more employee on internal inspection methods
- Weekly smaller space inspections conducted
- Require internal inspectors to write details
 - What was observed
 - Was a nonconformance identified
 - Was a correction completed, and appropriate person notified
- Issue CAPA's



Notable Bakery Recalls in 2024

FDA lists all the recalls issued on their website at:

<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts>

You can search by product type “food and beverage.” You can’t drill down to bakery.

In 2025 so far related there have been

- 11 Total recalls issued
 - 10 for allergen mislabeling - 2 bakery products (undeclared milk)
 - 1 for Listeria (cheese product)

Notable Bakery Recalls in 2024 & 2025

Per Tracecone – 40% of recalls were for Unintended allergens found in products

- The great cinnamon recall of 2024
- 10-23-2024 Treehouse for possible Listeria contamination.
- 1-15-2025 Pearl Milling Company: Undeclared Milk Allergen

The Impact

- Harm to consumers – ill or worse, they die
- Impact to brand reputation and sales
- People losing their jobs
- People go to jail
- Impact on the industry as a whole



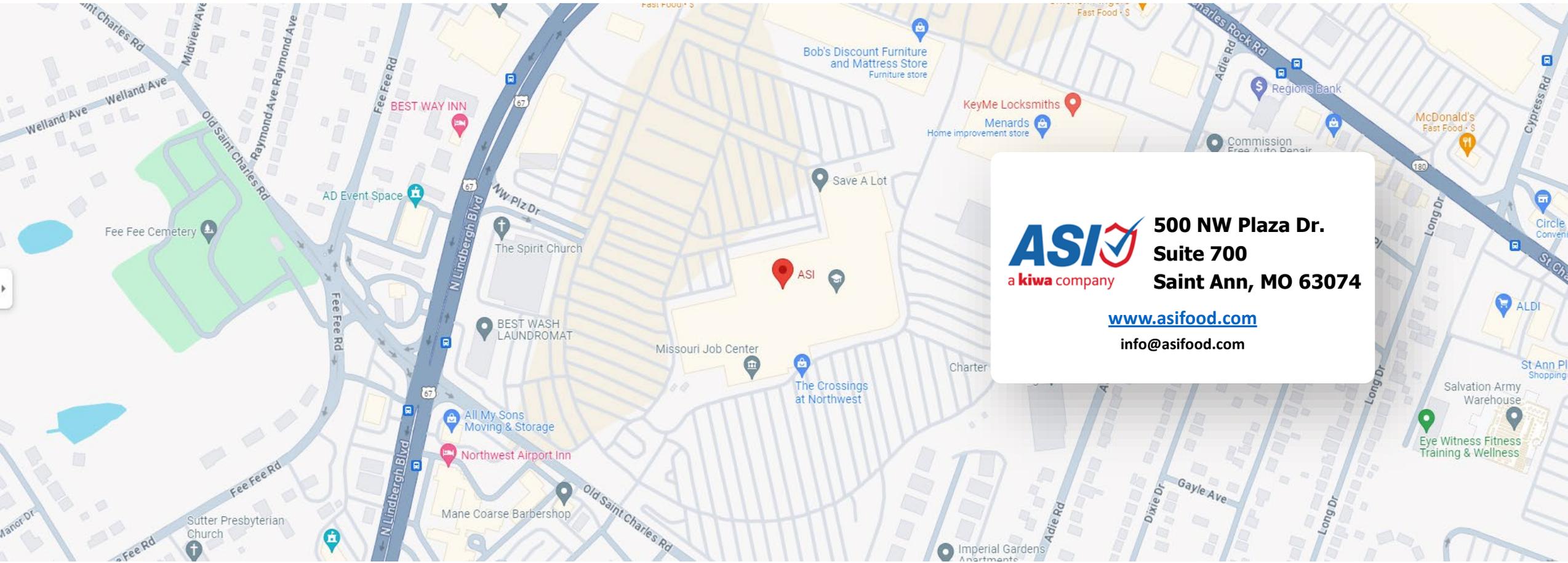
Summary

- Discussed the Importance of Food Safety
 - Protect Business & Employees
 - Protect Consumers
- Top 10 Common Mistakes & How to Prevent
 1. Understanding the Requirements
 2. Written Policy
 3. Written Procedures
 4. Training
 5. Cleaning and Sanitation
 6. Allergen Management
 7. Environmental Monitoring
 8. Pest Management
 9. Storage of Materials
 10. Internal Audits
- Recent Recall
 - Allergen Management and Environmental Monitoring (with sanitation practices)

Questions & Answers



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