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## Preventive Controls Summary

Edison Grain Incorporated (Edison Grain) is in compliance with the requirements of 21 CFR Part 117, the Preventive Controls for Human Food (PCHF) rule. Edison Grain conducted a hazard analysis of its products and processes to identify biological, chemical, and physical hazards. While our products are generally low risk, we identified hazards that require preventive controls, including biological hazards such as Salmonella and pathogenic E. coli, chemical hazards such as allergens and mycotoxins, and physical hazards such as metal and agricultural debris.

Edison Grain has implemented a Food Safety Plan that includes the following preventive controls to address identified hazards:

**Supply-Chain Preventive Controls.** Edison Grain has developed a robust supply-chain program, as many identified hazards require a supply-chain-applied control. We approve suppliers before receiving products, and update documentation and approval annually. Supplier verification activities include:

- **Product Testing** – Each lot of incoming product is sampled and sent to an independent ISO 17025 accredited laboratory for microbiological and gluten testing. Microbiological tests conducted include Aerobic Plate Count, Coliform, E. coli, E. coli O157:H7, Listeria spp., Salmonella spp., Staphylococcus aureus, and Yeast & Mold.
- **Onsite Audits** – Our suppliers are 3<sup>rd</sup> party certified for food safety, and most are certified under GFSI-recognized schemes such as SQF, BRC, and FSSC. We review 3rd party onsite audit reports (including corrective actions) upon initial supplier approval and periodically thereafter to verify ongoing compliance. Based on our hazard analysis, we have determined that it is necessary to review 3rd party audit reports on an annual basis for our ready-to-eat products.

**Process Preventive Controls.** To control for metal hazards, Edison Grain passes finished products through metal detection. To enhance our ability to control all physical hazards as well as mycotoxin hazards and allergen cross-contact hazards inherent in agriculture, we are installing an optical sorting system with gravity metal detection and a rare earth magnet. This system should be in operation by mid-2018.

**Allergen Preventive Controls.** While Edison Grain is a gluten-free facility, a milk allergen is present in one product, Edison Grainery Organic Q Mac® Quinoa Pasta & Cheese. Edison Grain also warehouses, but does not process, products containing peanuts and tree nuts. We have established allergen preventive controls to prevent undeclared allergens in food labeling and to ensure protection of food from allergen cross-contact. Cross-contact controls are present at multiple steps including receiving, storage, production, and shipping.

**Sanitation Preventive Controls.** Sanitation is an obsession at Edison Grain. We have established sanitation preventive controls to prevent microbiological cross-contamination, recontamination with environmental pathogens, and allergen cross-contact. Preventive controls include hygienic zoning practices and sanitation procedures for our production equipment, production rooms, and equipment wash area. We utilize extensive ATP swabbing to verify the cleanliness of food contact surfaces after cleaning. Our environmental monitoring program verifies the effectiveness of hygienic zoning and sanitation procedures to control Salmonella and Listeria.



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