

Holding Produce Pending a Test Result

Some in the food safety community will tell you that products should be held (not shipped) until a test result is received that is within acceptable levels (*e.g.*, absence of pathogens). But the sales team may need to fill an order, and some could argue that if the food safety team does a good job, the test result should be ok. Some companies settle on a “test and roll” approach where product is shipped while results are pending, timed in such a way that the product should still be easily retrieved and should be contained if there is an issue. However well-intentioned, such a practice can go awry.

The perishability of many fresh produce items further exacerbates the pressure to ship (or simply not test) product. This document lays out factors you may want to consider when determining the circumstances under which product should be held. Whether testing is being done by a regulator or by your company, and whether testing is routine/random or based on some pre-existing concern may also influence a company’s decision.

Factors that favor holding product

- Product shelf life is long enough and the test method is rapid enough that results are available with minimal impact to quality/ shelf life
- A positive result (*e.g.*, above acceptable limits) would result in a Class 1 recall (*e.g.*, *Salmonella*, *E. coli* O157:H7, *Listeria monocytogenes*)
- The company cannot afford the direct and/or indirect costs of a recall
- The product is your brand (increased reputational risk)
- Published or other reliable data show that contamination rates are relatively high (*e.g.*, >1%)
- The number of samples taken, and the amount of product sampled is likely to detect very low rates of pathogen contamination
- Customer requirements or written company policy requires that product be held
- Your company is risk averse when it comes recalls
- Experience that whatever can go wrong *will* go wrong

Factors to consider for releasing product

- It will take a long time to get the test result back relative to product shelf life
- Recall insurance or other financial loss mitigations are available (not all policies cover all circumstances)
- Your company did not grow, pack, or process the product
- Validated, verified food safety mitigations significantly reduce the likelihood of contamination
- Published or other reliable data indicate that the level of contamination is low
- The sampling and testing methodology will only detect gross levels of pathogen contamination (*e.g.*, >5%)
- The sample is *not* being evaluated for pathogens (*e.g.*, quality indicators, pesticides, etc. that will not result in a Class 1 recall)
- Your company is willing to take the risk of a recall

Ultimately, there is no right or wrong answer. The decision to hold or ship product is a risk-based business decision.