

**Conference for Food Protection
2010 Issue Form**

**Internal Number: 047
Issue: 2010 III-013**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

All information above the line is for conference use only.

Title:

Bare Hand Contact for RTE Ingredients that are Fully Cooked After Handling

Issue you would like the Conference to consider:

Foods that may be ready to eat (RTE) but are not treated as RTE in their application should not be regarded RTE. RTE foods that are further fully cooked should be treated as raw foods and bare hand contact should be permitted. An example of this case is pizza toppings for commercial pizza operations. These items, e.g., cooked ground meat, cooked sausage and fresh uncooked vegetables, are RTE. However, they are ingredients placed on a pizza that is the baked in commercial ovens and served as a fully cooked pizza. Therefore, these items in this cooked pizza application are ingredients and should be able to be handled with properly cleaned bare hands.

Public Health Significance:

It is important that fully cooked foods meet the time and temperature requirements identified in the FDA Food Code. In this case, given that some of the RTE items on pizzas are animal products, the requirements for fully cooked status are Subparagraph 3-401.11 (A) (2) for comminuted, mechanically tenderized or injected meats, requiring 155 degrees F for 15 seconds; and Subparagraph 3-401.11 (A) (3) for poultry products, which requires cooking to internal temperature of 165 degrees F for 15 seconds. These temperatures and times, or their equivalents, are recognized as effective to destroy pathogenic bacteria in raw products that permit bare hand contact.

In order for ingredients to be handled with bare hands, they would not be considered RTE but instead as raw materials. The finished product for the consumer, in this case a pizza, is fully cooked to at least an internal temperature of 165 degrees F for 15 seconds. In addition, food establishments follow other Food Code requirements for personal hygiene and avoidance of cross-contamination to ensure that both ingredients and finished products are safe to consume and meet all FDA Food Code requirements.

Recommended Solution: The Conference recommends...:

that a letter be sent to FDA requesting that ¶ 3-301.11 (D) be amended by adding a new Subparagraph 3-301.11 (D) (1) with the following language:

3-301.11(D) (1) the ready-to-eat food is further fully cooked.

and renumbering ¶ (D) subparagraphs appropriately,

OR

that § 3-404.12 be added to the FDA Food Code to address RTE ingredients that are further fully cooked. The Section should include the following language:

Ingredients from containers that are used exclusively in food products which are subsequently fully cooked are not considered RTE and may be handled with bare hands.

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