**Conference for Food Protection**

**2012 Issue Form**

**Internal Number: 120**

**Issue: 2012 III-018**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **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:**

Harmonize Time/Temperature Charts in Food Code with FSIS Guidance

**Issue you would like the Conference to consider:**

The Food Safety Inspection Service (FSIS) is recommending that changes be made to FDA Food Code § 3-401.11 Cooking to:

* Resolve minor discrepancies between the time and temperature combinations specified in the Food Code for cooking of non-intact meat products at retail and what is specified in FSIS Guidance directed at meat and poultry processors;
* Revise the minimum time and temperature requirements for meat roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham to reflect updated FSIS Guidance for these products;
* Refer to appropriate FSIS Guidance documents for additional appropriate time and temperature combinations not currently specified in the Food Code for cooking of non-intact meat chops, roasts and steaks;
* Clarify what cooking criteria applies to intact meats and which applies to non-intact meats; and
* Establish minimum instantaneous cooking temperatures for products for ones which do not currently exist in the Food Code, including for poultry, baluts and wild game animals.

**Public Health Significance:**

The differences between specific criteria contained in the Food Code and in FSIS guidance documents are, for the most part, minimal and, therefore, would have negligible impact on food safety. For example, FSIS Guidance on Safe Cooking of Non-Intact Meat Chops, Roasts, and Steaks recommends that such products be cooked to 68°C (155°F) for 17 seconds while the Food Code recommends that such products be cooked to a minimum temperature of 68°C (155°F) for 15 seconds. These differences are likely a matter of rounding as all times in the FSIS guidance that were a fraction of a minute or second were rounded up to the next whole number (e.g., 16.2 seconds for 155 °F was rounded up to 17 seconds). Although small, such discrepancies lead to confusion. FSIS Guidance on Safe Cooking of Non-Intact Meat Chops, Roasts, and Steaks contains additional time-temperature combinations that are also appropriate for cooking the animal products covered in 3-401.11(A)(2). FSIS recommends these additional time and temperature combinations be established in the Food Code by reference to the Guidance document.

The time and temperature combinations in § 3-401.11(A)(2) for mechanically tenderized and injected meats should also apply to meat roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham. The current Food Code time and temperature recommendations for meat roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham [see § 3-401.11(A)(3)] refer to time and temperature combinations that were derived from USDA/FSIS Appendix A. Compliance Guidelines For Meeting Lethality Performance Standards For Certain Meat And Poultry Products (http://www.fsis.usda.gov/oa/fr/95033f-a.htm).

The time and temperature combinations in Appendix A achieve a 6.5 log reduction in Salmonella. More recently, FSIS has issued new guidelines specifying that a minimum of 5-log reduction in Salmonella is acceptable for lamb, pork, and cured pork roasts such as ham as well as for mechanically tenderized and injected meats. FSIS is considering extending the minimum 5 log reduction to meat roasts including beef and corned beef, prior to issuance of the 2013 Food Code. The time and temperature combinations in the FSIS Guidance on Safe Cooking of Non-Intact Meat Chops, Roasts, and Steaks will achieve a 5-log reduction in Salmonella. Therefore, in order to be consistent, retail and foodservice institutions producing meat roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham should have the option of meeting criteria that is based on the new guidance.

CFP Issue # 2002-I-33 from the 2002 Conference recommended that USDA and FDA work together to establish instantaneous cooking temperatures for animal products that to date had minimum cooking temperatures that included a minimum dwell time of 15 seconds. FSIS is recommending deleting the 15 second dwell time from the minimum criteria specified in Subparagraph 3-401.11(A)(3) for the products covered under that subparagraph. This recommended change is based on FSIS guidance in the Time-Temperature Tables for Cooking RTE Poultry Products. FSIS believes that if poultry products are cooked to the minimum temperatures specified, it is not necessary to specify a minimum 15 second dwell time.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to the FDA requesting the 2009 Food Code (as modified by the Supplement issued in 2011) be amended as follows:

1) Changes be made in strike through to remove language and underline to add language format to § 3-401.11 Cooking of the Food Code:

**3-401.11 Raw Animal Foods.**

(A) Except as specified under ¶ (B) and in ¶¶ (C) and (D) of this section, raw animal foods such as eggs, fish, meat, poultry, and foods containing these raw animal foods, shall be cooked to heat all parts of the food to a temperature and for a time that complies with one of the following methods based on the food that is being cooked:

(1) 63°C (145°F) or above for 15 seconds for:

(a) Raw eggs that are broken and prepared in response to a CONSUMER's order and for immediate service, and

(b) Except as specified under Subparagraphs (A)(2) and (A)(3) and (B), and in (C) of this section, FISH and **INTACT** MEAT including GAME ANIMALS commercially raised for FOOD as specified under Subparagraph 3-201.17(A)(1) and GAME ANIMALS under a voluntary inspection program as specified under Subparagraph 3-201.17(A)(2);

(A)(2) 68°C (155°F) for ~~15~~ **17** seconds or for the temperature specified in the following chart that corresponds to the holding time for RATITES, MECHANICALLY TENDERIZED, and INJECTED MEATS, **MEAT roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham**; the following if they are COMMINUTED: FISH, MEAT, GAME ANIMALS commercially raised for FOOD as specified under Subparagraph 3-201.17(A)(1), and GAME ANIMALS under voluntary inspection program as specified under Subparagraph 30201.17(A)(2); and raw EGGS that are not prepared as specified under Subparagraph (A)(1)(a) of this section:

[See attachment (Table 1) for strike through changes to Table.]

(A)(3) 74°C (165°F) or above ~~for 15~~ for POULTRY, BALUTS, wild GAME ANIMALS as specified under Subparagraphs 3-201.17(A)(3) and (4), stuffed FISH, stuffed MEAT, stuffed pasta, stuffed POULTRY, stuffed RATITES, or stuffing containing FISH, MEAT, POULTRY, or RATITES.

~~(A) Whole MEAT roasts including beef, corned beef, lamb, pork and cured pork roasts such as ham shall~~~~be cooked:~~

~~(1) In an oven that is preheated to the temperature specified for the roast's weight in the following chart and that is held at that temperature:~~

[See attachment (Table 2) for strike through changes to Table.]

~~and~~

~~(2) As specified in the following chart, to heat all parts of the food to a temperature and for the holding time that corresponds to that temperature:~~

[See attachment (Table 3) for strike through changes to Table.]

2) Food Code Annex 3 Public Health Reasons Section 3-401.11 related to Cooking (pages 396-398 of 2009 Food Code), that describe the background for the time temperature combinations, be updated to reflect these changes.

3) Food Code Annex 3 Public Health Reasons Section 3-401.11 related to Cooking (396-398 of 2009 Food Code), be updated to include further temperatures found in FSIS Guidance on Safe Cooking of Non-Intact Meat Chops, Roasts, and Steaks, available at: http://askfsis.custhelp.com/ci/fattach/get/4648/, and toinclude an additional recommendation that MEAT roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham may also be cooked using the time-temperature combinations in Appendix A. Compliance Guidelines For Meeting Lethality Performance Standards For Certain Meat And Poultry Products, found at: http://www.fsis.usda.gov/oa/fr/95033f-a.htm.

**Submitter Information:**

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Kristi Barlow | | |
| Organization: | USDA/FSIS | | |
| Address: | Address: 1400 Independence Avenue, SW, 8th Floor, PP3 | | |
| City/State/Zip: | Washington, DC 20024 | | |
| Telephone: | 202-690-7739 | Fax: |  |
| E-mail: | kristina.barlow@fsis.usda.gov | | |

**Attachments:**

* "TIME-TEMPERATURE TABLES FOR COOKING READY-TO-EAT POULTRY PRODUCTS"
* "FSIS Guidance on Safe Cooking of Non-Intact Meat Chops, Roasts, and Steaks"
* "Annex 3 Food Code"
* "Table 1"
* "Table 2"
* "Table 3"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.