

Conference for Food Protection - Committee FINAL Report

Template approved: 08/14/2013

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COMMITTEE NAME: *Listeria* Retail Guidelines

COUNCIL or EXECUTIVE BOARD ASSIGNMENT: Council III

DATE OF REPORT: December 6, 2013

SUBMITTED BY: Dale Grinstead and Haley Oliver

COMMITTEE CHARGE(s):

Issue: 2012 III-022

The Conference recommends that a CFP Committee be created to revise the 2006 CFP "Voluntary Guidelines of Sanitation Practices Standard Operating Procedures and Good Retail Practices to Minimize Contamination and Growth of *Listeria monocytogenes* (*Lm*)" to incorporate the following:

1. Sanitation guidance for slicers,
2. Information on cross contamination and harborage points for *Lm*,
3. More detailed information about how sampling for *Lm* can be conducted as part of a strategy for preventing *Lm* contamination at retail,
4. Updating outdated links to other documents, and
5. Other relevant information identified by the Committee.

The Conference also recommends that the Committee report its recommendations back to the 2014 Biennial Meeting with Issues to address the above charges and include recommendations that a letter be sent to FDA requesting that Annex 2 (References, Part 3-Supporting Documents) be amended by adding a reference to the revised voluntary guidelines.

COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

1. Progress on Overall Committee Activities:
 - a. There was considerable discussion in the Committee about the nature of the charges to the Committee. Much of the first nine months of the Committee effort was spent discussing the charges. Items discussed included:
 - a.i. The relative risk that slicers play in a retail deli and the appropriateness of a sanitation guidance focusing just on slicers.
 - a.ii. Whether data on harborage is complete and sufficient to include in the update to the 2006 guidance document.
 - a.iii. The specific role that environmental sampling in general and *Listeria* sampling in particular has to play in a food safety program for retailers.
 - a.iv. Whether the Committee would be able to address the charges as given to the Committee.

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These discussions continued until May 2013 when the Committee voted to go forward with the charge as given to the Committee. At that point, three sub-committees were formed to prepare first drafts of the edits addressing the first three points of the charge which was where the Committee felt most of the time would be spent. The work product was due from these sub-committees the first week of August. These first draft “straw model” edits could then be presented to the entire Committee for discussion and final edits.

b. Sub-Committee Formation

The sub-committees that addressed each of those points were:

- i. Sub-committee 1. Sanitation guidance for slicers: Henry Blade, Tom Ford, Laurie Williams, and Neil Ylanan
- ii. Sub-committee 2. Information on cross contamination and harborage points for *Lm*: Dave Konop and Haley Oliver
- iii. Sub-committee 3. More detailed information about how sampling for *Lm* can be conducted as part of a strategy for preventing *Lm* contamination at retail: Matthew Colson, Dale Grinstead, Kristina Barlow, and Sue Kowalczyk.

The first group (sub-committee 3) that delivered a “straw model” set of edits was the sampling sub-committee. Those initial edits were presented to the Committee as a whole on August 12, 2013. There was extensive debate over those edits and many calls and revisions of those sampling guidelines were proposed. Although the Committee considered this point of the charge extensively and debated for many months, the Committee could not reach a consensus. Eventually the discussion was concluded by drafting two sets of edits to the guidance document that addresses sampling. One was a very simple section where the guidance was edited to state that if an establishment was considering a sampling program, that establishment should consult with an expert to guide them on the role that such sampling could play in that establishment’s particular strategy to prevent *Lm* contamination. The other was a more complex set of edits with considerably more detail. The Committee voted and a clear majority (12 of 17 members that were eligible to vote) was in favor of the simpler version.

The second subcommittee (sub-committee 2) that reported to the Committee as a whole was the group addressing the second element of the charge which is information on harborage points and cross contamination. Although there is considerable new information that was known to the Committee on this topic and the researchers that had that data generously allowed the Committee to use it if we wished, that data has not yet been published in peer-reviewed journals. Although no one on the Committee doubted the data, it was generally felt that it would not be appropriate to include data in the guidance that had not been peer-reviewed. The researchers who have that data have many publications in progress and they expect a large number of publications that directly address harborage points for *Lm* in food establishments to be published over the next 18 months. The Committee decided not to address this element of the charge at this time. The Committee felt that a new issue should be submitted to the 2014 Biennial Meeting to form a Committee to

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address this element of the charge - because the upcoming publications will allow much more meaningful edits to the guidance document on this element of the original charge.

The final sub-committee (sub-committee 1) was the slicer sanitation group that worked on the first element of the charge.

The FDA representative of the team led a review of the 2006 CFP *Listeria* Retail Guidelines document to update all links for accuracy.

c. Outcome of each charge:

- i. Sanitation guidance for slicers: Several drafts have been prepared by the sub-committee working on this portion of the charge; however, the drafts require additional work to arrive at a consensus on the content of the material that addresses this charge.
- ii. Information on cross contamination and harborage points for *Lm*: There is considerable new information on cross contamination and harborage points for *Lm* that is coming; however, the majority of that data has not been published in peer-reviewed journals yet. The Committee believes that a renewal of this charge would allow this very useful data that will shortly be published to be included in the document and would make a far more useful guidance. That has been addressed in the Issue being presented by this Committee titled *Listeria* Committee 2: Continuation of the *Listeria* Retail Guidelines Committee.
- iii. More detailed information about how sampling for *Lm* can be conducted as part of a strategy for preventing *Lm* contamination at retail: The Committee considered this charge for many months and the majority viewpoint of the Committee was that a food establishment that was considering a sampling plan should consult an expert to guide them on the role that such sampling could play in that establishment's particular strategy to prevent *Lm* contamination.
- iv. Updating outdated links to other documents: The links have been updated and will be included in the revised currently posted "2006 CFP "Voluntary Guidelines of Sanitation Practices Standard Operating Procedures and Good Retail Practices" document.
- v. Other relevant information identified by the Committee: The Committee felt there were other items that would have been appropriate for inclusion in the guidance (e.g., Sanitation Standard Operating Procedures, information on prerequisite programs, hygienic design information). However, the time that it took to arrive at a conclusion on the other charges precluded including this information in time for the 2014 CFP Biennial Meeting. The second issue submitted by this Committee re-creates this charge.

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2. Recommendations for consideration by Council:
 - a. The Committee recommends that the *Listeria* Retail Guidelines Committee be continued/re-created.
 - b. While the Committee believes the third and fourth charges have been completed, the Committee recommends that all charges be continued. The Committee believes that this would allow the time needed for publication of additional relevant data and for inclusion of additional useful information in this guidance document.

CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. Report - *Listeria* Retail Guidelines Committee. This Issue acknowledges the Committee report and thanks the committee members for their work.
 - 1.a. Attachment 1: 2012-14 *Listeria* Retail Guidelines Committee Final Report
 - 1.b. Attachment 2: 2012-14 *Listeria* Retail Guidelines Committee Roster
2. *Listeria* 2: Re-create the *Listeria* Retail Guidelines Committee. This Issue recommends re-creating the Committee for continuation of the *Listeria* Retail Guidelines Committee with the same charges.

COMMITTEE MEMBER ROSTER (attached):