

# Conference for Food Protection – Committee FINAL Report

Template approved: 08/14/2013

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**COMMITTEE NAME:** Emergency Action Plan (EAP) Committee

**COUNCIL or EXECUTIVE BOARD ASSIGNMENT:** Council III

**DATE OF REPORT:** December 19, 2013 (revised February 16, 2014)

**SUBMITTED BY:** Dale Yamnik and DeBrena Hilton, Co-Chairs

## COMMITTEE CHARGE(s):

The Charges assigned to the EAP Committee came from two of Council III's Issues, Issue 2012 III-021 and Issue 2012 III-25; and were as follows:

### Issue 2012 III-021 Determining the Disposition of Refrigerated PHF (TCS food) above 5°C (41°F)

(1) A letter be sent to FDA requesting that the following be added to the FDA Food Code Annex #4, *Management of Food Safety Practices-Achieving Active Managerial Control of Food borne Illness Risk Factors* (new language in underline format):

To ensure the safety of food, a food establishment may develop written plans to address how they will handle potentially hazardous food (PHF-temperature controlled for safety food) during emergencies (e.g., interruption of electrical service, loss of power, or equipment failure) using the following criteria: Criteria for determining when refrigerated PHF (TCS food) can be safely sold following an increase in cold holding temperature

- A. Refrigerated PHF (TCS Food) can be safely held and sold at temperatures above 5°C (41°F) provided:
  - 1. Written procedures are in place to specify the methods used to demonstrate compliance with Parts B and C below.
- B. Refrigerated PHF (TCS food) can be held and sold at a temperature up to 7.2°C (45°F) provided:
  - 1. The total time during which the food is above 5°C (41°F) but not over 7.2°C (45°F) is 15 hours or less
  - 2. By the end of 15 hours the food has returned to 5°C (41°F) or lower
  - 3. The food shall be monitored to ensure the warmest portion of the food does not exceed 7.2°C (45°F) during the 15-hour period, unless an ambient air temperature is maintained that ensures the food does not exceed 7.2°C (45°F) during the 15-hour period;
  - 4. The food shall be destroyed if it does not meet the criteria in 1-3 above.
- C. Refrigerated PHF (TCS food) can be held and sold at a temperature up to 10°C (50°F) provided:
  - 1. The total time during which the food is above 5°C (41°F) but not over 10.0°C (50°F) is 9 hours or less
  - 2. By the end of 9 hours the food has returned to 5°C (41°F) or lower
  - 3. The food shall be monitored to ensure the warmest portion of the food does not exceed 10.0°C (50°F) during the 9-hour period, unless an ambient air temperature is maintained that ensures the food does not exceed 10.0°C (50°F) during the 9-hour period;
  - 4. The food shall be destroyed if it does not meet the criteria in 1-3 above. .

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AND

(2) that the Conference create a committee to review and update the *CFP Emergency Action Plan for Retail Food Establishments* and that the committee be charged to:

1. review and update the *CFP Emergency Action Plan for Retail Food Establishments* where appropriate,
2. incorporate the criteria above into the *CFP Emergency Action Plan for Retail Food Establishments*,
3. report back to the CFP at the 2014 Biennial Meeting with a recommendation to accept the revised plan and
4. recommend that FDA include reference to the *CFP Emergency Action Plan for Retail Food Establishments* in Annex 2 of the Food Code.

## Issue 2012 III-025 Dual-Step Hand Cleanse-Sanitize Protocol without Water

(1) A letter be sent to the FDA requesting the 2009 Food Code (as modified by the Supplement issued in 2011) be amended with the following intent:

In situations such as catastrophic natural or man-made disasters provisions for handwashing will be in accordance with emergency guidance documents.

(2) The CFP committee created as recommended in Issue 2012 III-021 be charged with revising the CFP Emergency Action Plan for Retail Food Establishments also include in their charge a review and recommendations for situations such as catastrophic natural or man-made disasters provisions for handwashing in accordance with emergency guidance documents.

## COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

1. Progress on Overall Committee Activities:

### Executive Summary

The CFP Emergency Action Plan (EAP) Committee had a very active membership which met 14 times over the last biennial cycle. The initial focus of the committee was to incorporate the recommendations from the Food Marketing Institute (listed as item 1. in the above charges for Issue 2012 III-021) into the CFP guidance document presented at the 2008 CFP biennial meeting and titled *Emergency Action Plan for Retail Food Establishments*. The information for determining when refrigerated Potentially Hazardous Foods (Time/Temperature Control for Safety Food) (PHF/TCS) food can be safely sold following an increase in cold holding temperature was transformed into a chart with three specific examples of how the chart could be applied. After finalizing the chart an online vote was conducted, and universal consensus was reached to accept this information for inclusion in the Interruption of Electrical Service section of the revised *Emergency Action Plan for Retail Food Establishments, Second Edition* document.

We then reviewed the rest of the 2008 CFP *Emergency Action Plan for Retail Food Establishments* document and updated 6 Sections while deleting 5 others. The committee felt that the sections removed were covered in other nationally available materials and did not fit into the accidental and natural disaster categories covered in the revised *Emergency Action Plan for Retail Food Establishments, Second Edition*.

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The Committee decided early on that we would defer the Charge created by Issue 2012 III-025 to the Hand Hygiene Committee for determining an alternative emergency hand washing procedure and would incorporate their outcome into our report. Since the Hand Hygiene Committee did not reach consensus on an alternative procedure, the EAP committee created an alternative procedure for use during emergency situations which still requires the use of soap and water and which can be found in the Chapters on Interruption of Water Service (pages 26-27) ; Contaminated Water Supply (Biological) (Pages 32-33); and Sewage Backup (pages 39-40).

All of the charges issued to the EAP committee were fulfilled and the committee is submitting 3 Issues to address these charges.

## Membership

The EAP Committee had a very successful two year cycle. The EAP committee maximized committee membership by having all four constituencies represented; Industry (food service and grocery), Regulatory (Federal, State and Local), Academia and Consumer. Additionally, our membership was very stable throughout our discussions. We had no members leave or join the committee, although one member switched from food service to grocery but that did not significantly change our Committee representation.

The Chairs want to thank all the Committee members for their diligence and faithfulness in attending our calls and providing verbal and written feedback as we reviewed the guidance document. The Committee would also like to give special recognition to Jill Hollingsworth and DeBrena Hilton. Jill tracked the changes recommended on each conference call and updated the guidance document entitled the *2014 Emergency Action Plan for Retail Food Establishments*. She also created a new format for the revised Guidance document which improved flow and understanding of the document. DeBrena diligently took detailed notes on each of our conference calls which helped those who were unable to attend our calls keep up with committee discussions. Jill and DeBrena attended all EAP Committee conference calls.

We found that by using the scheduling website, Doodle, we were able to have very good attendance on our conference calls. We averaged approximately 2/3 of our membership on each call. Call attendance ranged from a low of 50% to a high of 85%. In addition to having good attendance, members also were very vocal and provided great ideas and suggestions to improve the guidance document.

## Committee Work

The EAP Committee started our work by identifying our work strategy. We decided that all work would be conducted via conference call and that we would start with the Interruption of Electrical Service section.

We decided that although we would use much of the existing document's content, we would do extensive reformatting. Since we were making extensive reformatting changes, the committee decided it would be best to submit a finished document without track changes.

We reviewed the existing Guidance document and decided which chapters to keep and those that would be deleted from the new manual. We updated the following sections of the manual with some new content and extensive reformatting for inclusion into the new manual:

- A. Interruption of Electrical Service
- B. Interruption of Water Service

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- C. Contaminated Water Supply (Biological)
- D. Sewage Backup
- E. Fire and
- F. Flood

The Committee decided to delete the following sections from the Guidance document:

- A. Infectious Disease Contamination-Bloodborne Incidents
- B. Infectious Disease Contamination-Vomit Incidents
- C. Bioterrorism Prevention and Terrorist Threat Procedures
- D. Protocols for Suspicious letters and Packages
- E. Recovery Guidelines for Intentionally Adulterated Food

The committee felt that the items that were deleted did not fit well with the recommended guidance for emergency situations that were left in the manual. The guidance included in the revised document covers emergencies that are accidental or Mother Nature induced incidents. Whereas the ones deleted are intentional or man-induced emergencies.

The EAP Committee felt our initial and primary focus was identifying how to incorporate the Food Marketing Institute recommended language regarding disposition of Potentially Hazardous Food/Time Temperature Control for Safety (PHF/TCS) food held above 41° F (5° C) into the guidance document in a format and manner that would be clear and understandable. We also wanted to make sure individuals using the guide realized that this time/temperature guidance was for true emergency situations and not for everyday usage. That mantra then pervaded our approach to all sections of the manual.

In the introductory Chapter there is an explanation of the difference between localized and widespread emergencies. It also explains the importance and roles of people, equipment, operational directives, temperature monitoring and waste disposal.

Finally, regarding the request to develop an alternative emergency handwashing procedure, we initially decided to defer to the Hand Hygiene Committee which was working on this issue. We felt it would be best to let them create the procedure and then we would incorporate it into the revised *Emergency Action Plan for Retail Food Establishments, Second Edition* document. Since the Hand Hygiene Committee was unable to reach consensus on this issue, we created and incorporated a procedure for emergency hand washing into the new guidance document. This procedure requires the use of soap and water and specifies handwash facility placement.

## Committee Charges

The first charge listed in Issue 2012 III-021 was for a letter to be sent to FDA to add language to the *FDA Food Code Annex #4, Management of Food Safety Practices-Achieving Active Managerial Control of Foodborne Illness Risk Factors* that incorporates criteria for determining when refrigerated PHF/TCS food can be safely sold following an increase in cold holding temperature during emergency power outages. However, FDA did not incorporate these criteria into the 2013 FDA Food Code. The EAP Committee was also asked to incorporate this language into the guidance document we created and this will be discussed later in this report.

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The EAP committee was given 5 charges at the 2012 CFP. The first charge from Issue 2012 III-021 was to update the *2008 CFP Emergency Action Plan for Retail Food Establishments* document. This document has been updated and is attached for Conference members to review. It is titled *Emergency Action Plan for Retail Food Establishments, Second Edition*. The previous guidance document accepted at the 2008 CFP biennial meeting (*Emergency Action Plan for Retail Food Establishments*) is available for comparison on the CFP web site at [www.foodprotect.org](http://www.foodprotect.org) under the Conference Developed Guides and Documents tab: <http://www.foodprotect.org/media/guide/EmergencyActionPlanforRetailFoodEstablishments2008.pdf>

Significant changes to the revised guidance document include:

- A. The deletion of five of the sections in the previous guidance document as noted above.
- B. Re-titling the sections (although the vast majority of content remained the same) within each Chapter (the Power Outage verbiage is used as an example below and is replaced in each chapter of the Guidance document with that chapter's specific emergency i.e. flood, fire, etc.):
  - a. Planning for a Power Outage Emergency includes steps that should be taken when developing a written response plan for an emergency of this type.
  - b. Assessing a Power Outage Emergency section aides the reader in determining the extent of the emergency and whether the establishment can remain open during the event.
  - c. Business Continuity during a Power Outage outlines items that should be considered to ensure safe food handling if the establishment determines it can safely operate during the emergency.
  - d. Recovery following a Power Outage lists steps to be taken once the emergency is over in order to safely return the establishment to pre-emergency condition.
- C. Developing uniform handwashing and toilet facility requirements that were used consistently throughout the Guidance document.
  - a. The use of soap and water for handwashing during emergency situations. The EAP Committee felt that since the Hand Hygiene Committee did not come to consensus on an alternative, non-water hand cleaning procedure, we would only include what has been historically accepted as an alternative handwashing procedure during emergency situations.
  - b. The Committee Co-Chair communicated frequently with the Hand Hygiene Committee on their charge to consider the potential use of alternative handwashing processes.

The second charge to the EAP Committee was to incorporate the language in section one of Issue 2012 III-021 into the revised emergency guidance document. Although we did not use the exact language from the original Issue, the intent was maintained. All changes were validated by Don Schaffner of Rutgers University using ComBase predictor model predictions for *Listeria monocytogenes* and a variety of conservative assumptions. The new language, chart and examples can be found at the end of the Interruption of Electrical Service Section of the revised guidance document.

Our third and fourth charges were to report back to the Conference and recommend inclusion of the revised *Emergency Action Plan for Retail Food Establishments, Second Edition* document into Annex 2 of the FDA Food Code. This Committee's final report, the Guidance document and Committee Issues constitute our report back to the Conference and completion of these charges.

The fifth charge from Issue 2012 III-025 to include alternative handwashing procedures was addressed by working within our committee to create and incorporate an acceptable procedure for emergency handwashing situations (using soap, water and paper towels) into the revised Guidance document. Since

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the Hand Hygiene Committee did not reach consensus on a non-water handwashing alternative procedure, we did not include one in our document.

## 2. Recommendations for consideration by council:

Based on our committees work, the Committee Co-Chairs are submitting 3 Issues on behalf of the Committee. Recommendations of this Committee through these Issues are:

- a. Issue 1:
  1. Thank Committee for its work,
  2. Acknowledge receipt of Committee's report, and
  3. Disband Committee as its charges have been completed.
- b. Issue 2:
  1. Accept the *Emergency Action Plan for Retail Food Establishments, Second Edition* document and post it on the CFP website in both PDF and Word formats.
  2. Request that FDA include reference to the *Emergency Action Plan for Retail Food Establishments, Second Edition* in Annex 2 of the FDA Food Code.
- c. Issue 3: Inserting the "Cold Holding of TCS Food" section (pages 15-20) of the *Emergency Action Plan for Retail Food Establishments, Second Edition* into the document currently posted on the CFP web site titled: *Emergency Action Plan for Retail Food Establishments*.  
NOTE: this Issue was recommended by FDA in the event the entire *Emergency Action Plan for Retail Food Establishments, Second Edition* document is not accepted by the Conference. This Issue would be withdrawn if the Conference accepts the committee's new guidance document.

## CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. Report - Emergency Action Plan (EAP) Committee
2. EAP 2 - Emergency Action Plan for Retail Food Establishments
3. EAP 3 - Time/Temperature Chart for Emergency Situations

## COMMITTEE MEMBER ROSTER (attached)

Emergency Action Plan Committee Roster.xlsx