

**Conference for Food Protection
2018 Issue Form**

Issue: 2018 III-002

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

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

Report – Special Process Controls Committee (SPCC)

Issue you would like the Conference to consider:

At the 2016 Biennial Meeting of the Conference for Food Protection, the Special Process Controls Committee was created and charged (Issue: 2016-III-034) to:

1. Review current FDA Food Code specialized processes, including curing and reduced oxygen packaging (ROP) in sections 3-502.11 and 3-502.12 to determine when and if food safety hazards could be controlled by a plan less than a full HACCP plan as defined in 8-201.14.
2. Report back findings and recommendations to the 2018 biennial meeting of the Conference for Food Protection.

Public Health Significance:

Special Processes are those retail food service processes that are more like food manufacturing processes rather than traditional retail or food service processes. Consequently, the FDA Food Code mandates the use of Hazard Analysis and Critical Control Point principles (HACCP) for most of these processes. Any HACCP guidance that CFP can provide to operators and regulators would enhance the food safety of these processes.

Recommended Solution: The Conference recommends...:

1. Acknowledgment of the 2016-2018 *Special Process Controls* Committee report;
2. Thanking the members of the Committee for their work; and
3. That the Committee be disbanded.

Submitter Information 1:

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Content Documents:

- "Committee Final Report"
- "SPCC Member Roster"
- "Single Hazard Special Process HACCP Template Guidance Document"
- "SHSP HACCP Template for ROP of Raw Meat, Cheese, Frozen Fish"
- "SHSP HACCP Template for Curing as a Single Special Process"
- "SHSP HACCP Template for Sushi Rice Acidification"

Supporting Attachments:

- "Special Process Controls Committee Notes"

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.

Committee Final Reports are considered DRAFT until acknowledged by Council or accepted by the Executive Board

COMMITTEE NAME: Special Process Controls Committee (SPCC)

DATE OF FINAL REPORT: *November 28, 2017*

COMMITTEE ASSIGNMENT: Council I Council II Council III Executive Board

REPORT SUBMITTED BY: Brian Nummer and Rebecca Krzyzanowski

COMMITTEE CHARGE(S):

Issue # 2016 III-034

1. To review current FDA Food Code specialized processes, including curing and reduced oxygen packaging (ROP) in sections 3-502.11 and 3-502.12 to determine when and if food safety hazards could be controlled by a plan less than a full HACCP plan as defined in 8-201.14.

2. Report back findings and recommendations to the 2018 biennial meeting of the Conference for Food Protection.

COMMITTEE WORK PLAN AND TIMELINE:

1. Held conference calls or email communications Monthly September 2016 - February 2017
 - a. By March 1, 2017, submit Periodic Report to Council III chairs so that they can submit same to the Executive Board at their Spring meeting
2. Held conference calls or email communications monthly March 2017-June 2017
 - a. July 1, 2017, submit Periodic Report to Council III chairs so that they can submit same to the Executive Board at their Fall meeting
 - b. Subcommittee formed and to meet once or twice a month
 - c. Templates to be developed
3. Held conference calls or email communications monthly June 2017-October 2017
 - a. By Nov 1, 2017, submit FINAL Report to Council III chairs
 - b. If committee approved, submit draft issue for the 2018 conference regarding codifying Special process HACCP templates
 - c. Once reviewed and approved by the committee three Special process HACCP templates will be submitted as an issue for the 2018 biennium conference.
4. The committee expanded their scope within the charge as validated by the Executive Board at the Spring 2017 Executive Board meeting so the work plan was expanded for remaining conference call/subcommittee call to include the following:
 - a. Template development
 - b. Where the templates will be made available/hosted – CFP website, codified, or referenced in Annex of Food Code.
 - c. Develop procedures for future templates to be reviewed and approved and submitted as draft issues for the 2018 Conference for Food Protection Biennium
 - d. By November 1, 2017, submit FINAL Report to Council III chairs

COMMITTEE ACTIVITIES:

1. ***Dates of committee meetings or conference calls***

August 29, 2016
Sept 12, 2016
Oct 10, 2016
Nov 7, 2016 – call canceled, accomplished tasks via email
Dec 5, 2016
Jan 9, 2017
Feb 2017 – call cancelled, accomplished tasks via email voting
March 6, 2017 – plus email voting
May 1, 2017
May 25, 2017 – subcommittee call
June 5, 2017
June 23, 2017 – subcommittee call
July 3, 2017 – no call – accomplished tasks via email July 10, 2017
Aug 7, 2017
Sept 11, 2017
Oct 2, 2017
Oct 23 – Final call for committee

2. Overview of committee activities:

- a. The committee convened on conference calls and via email. All action items were done by email vote. Committee and Chairs agree that CFP committee update reports were due March 1, 2017 and July 1, 2017. All committee activities finished in October 2017 and a final report by November 1, 2017.
 - i. Based on conference calls and an email vote the majority of committee participants indicated that they generally agree that there should be some form of food safety plan option less than a full HACCP plan under §8-201.14 of the US FDA model Food Code version. The name of that plan was still debatable. It was agreed during the Feb 27, 2017 email vote to use the title **Standardized Special Process Food Safety Plan**. Based on conference calls, the majority of participants indicated that they generally agree that a **Standardized Special Process Food Safety Plan** is appropriate when a Special process is “non-complex and deployed in a standardized manner”. Non-complex was further defined as having one Critical Control Point (CCP) or less or when a CFP stakeholder group reviewed a Special Process and determined it to be “non-complex and deployed in a standardized manner”.
 - ii. At the time of the May 1, 2017 conference call, the vision of the committee is that all **Standardized Special Process Food Safety Plans** will be created and reviewed/approved as a template through a CFP stakeholder process (yet to be determined). Additionally, there will NOT be an option for industry to originate creation of their own templated HACCP plan as they would be required to have full HACCP plan as defined in section 8-201.14 of the 2013 FDA model Food Code. Our federal partners have asked the Committee to discuss and clarify the intent of the **Standardized Special Process Food Safety Plan** within the context of section 8-201.14 of the 2013 FDA model Food Code to determine if and how to codify this issue.
 - iii. *April 2017* – The committee expanded their scope within the charge as validated by the Executive Board at the Spring 2017 Executive Board meeting to (1) Discuss how the **Standardized Special Process Food Safety Plan** could be codified with regards to §8-201.14 of the US FDA model Food Code including suggested issue(s) to be submitted and (2) Discuss how the proposed **Standardized Special Process Food Safety Plan** templates would be reviewed and approved through a formal CFP stakeholder process (submit as issues to Council)
 - iv. *April- August 2017*: The Committee formed a subcommittee to handle item (1) Discuss how the **Standardized Special Process Food Safety Plan** could be codified with regard to §8-201.14 of the 2013 FDA model Food Code including suggested issue(s) to be submitted above; and the main committee focused on (2) Discuss how the proposed **Standardized Special Process Food Safety Plan** templates would be reviewed and approved through a formal CFP stakeholder process. Four conference calls were held and draft **Standardized Special Process Food Safety Plan** templates were sent to all committee members with explicit instructions to review and comment back to the committee.
 - v. *August – October 2017*. The committee finalized all issues of discussion. Five CFP Issues will be written including three specifically to submit the Special Process Templates. It was decided that it was beyond the scope of this committee to develop a CFP stakeholder group. Instead three templates and a template

guidance document are intended to be the foundation for future work. Additional templates would need to be submitted as an Issue to a future CFP or the Executive Board as an Ad Hoc Committee. During the Oct 23, 2017 call, the committee voted unanimously with a few abstentions to move all issues (1-5) forward. Additionally, the template name was changed to “**Single Hazard Special Process HACCP**” at the advice of federal partners and the subcommittee members that were concerned with confusion that these are only special process HACCP with a single hazard. All templates and related Issues will from now be titled “**Single Hazard Special Process HACCP**”.

3. Charges **COMPLETED** and the rationale for each specific recommendation:

a) Charge 1: “To review current FDA Food Code specialized processes, including curing and reduced oxygen packaging (ROP) in sections 3-502.11 and 3-502.12 to determine when and if food safety hazards could be controlled by a plan less than a full HACCP plan as defined in 8-201.14.”

The committee voted in February 2017 on three questions and majority vote was “Yes” to all three, which addressed the current committee charge:

i. Do you agree that there is a benefit to food safety to have a regulatory option to control certain special process food safety hazards by a food safety plan less than a full HACCP plan as defined in 2013 FDA Food Code section 8-201.14?

ii. The committee has determined that an appropriate descriptive name for a food safety plan less than a full HACCP plan as defined in section 8-201.14 is: **Standardized Special Process Food Safety Plan**. Do you agree with this name?

iii. Do you agree that there is a benefit to food safety to have a regulatory option to control certain special process food safety hazards by a food safety plan less than a full HACCP plan as defined in section 8-201.14 **WHEN**:

--There is one or fewer CCPs or the Special Process is not complex and deployed in a standardized manner by operators as determined by CFP stakeholders AND

--A CFP stakeholder approved “Standardized Special Process Food Safety Plan” is available AND

--The operator’s regulatory jurisdiction approves of the use of any CFP stakeholder approved **Standardized Special Process Food Safety Plan**

Since the vote was a majority “YES” to each of the three committee questions posed therefore the committee expanded their scope within the charge as validated by the Executive Board at the Spring 2017 Executive Board meeting at the May 1, 2017 conference call to include:

i. Development of three templates for submission as issues for the 2018 CFP Biennial meeting. These templates for special processes were developed by email and committee calls between May 2017-October 2017:

-- Curing

-- Reduced Oxygen Packaging of Raw meat, cheese and frozen fish

-- Acidified Rice

ii. Propose how the templates could be codified with regards to §8-201.14 of the FDA model Food Code including suggested issue(s) to be submitted to the 2018 CFP Biennial meeting. This was discussed by Subcommittee in June/July 2017. Suggestions were sent to full committee for discussion Aug – Oct 2017. A statement will be added to the issues that will request reference to these templates in the Annexes of the US FDA model Food Code.

iii. Discuss how the proposed templates would be reviewed and approved through a formal CFP stakeholder process. A guidance document for creating future **Single Hazard Special Process HACCP** templates was developed and discussed by the committee Sept 2017-October 2017 via email and conference call. The proposed guidance for future template process will be sent as an issue to the 2018 CFP Biennial meeting.

b) Charge 2: Report back to the 2018 Conference for Food Protection.

The committee voted by voice Oct 23, 2017 (with a few email votes added of some not in attendance) to approve all five issues including the three **Single Hazard Special Process HACCP** templates for submission to the CFP Biennial meeting in 2018. Additionally, the template name was changed to “**Single Hazard Special Process HACCP**”.

1 4. Charges **INCOMPLETE** and to be continued to next biennium:

a. None – the charges are completed and will be reported back to Council III for approval.

2

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD:

No requested Executive Board action at this time; all committee requests and recommendations are included as an Issue submittal.

LISTING OF CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

1. Issue #1: Report – Special Process Controls Committee (SPCC) - Acknowledgement of the 2016-2018 Special Process Control Committee report and thanking the committee members for their work and to disband the committee.

a. List of content documents submitted with this issue:

- 1) Committee Final Report
- 2) Committee Member Roster
- 3) Single Hazard Special Process HACCP Template Guidance Document
- 4) Single Hazard Special Process HACCP for Reduced Oxygen Packaging of Raw Meat, Cheese Frozen Fish
- 5) Single Hazard Special Process HACCP for Curing as a Single Special Process
- 6) Single Hazard Special Process HACCP for Sushi Rice Acidification

b. List of supporting attachments:

- 4) 8-7-2017 Committee Call
- 5) 9-11-17 Committee Call
- 6) 10-2-17 Committee Call
- 7) 10-23-17 Committee Call

2. Committee Issue #2: SPCC 2 - Single Hazard Special Process HACCP Template Guidance Document - request approval of a guidance document for creation of future templates and posting on the CFP website.

3. Committee Issue #3: SPCC 3 – SHSP HACCP Template for ROP of Raw Meat, Cheese, Frozen Fish – request approval of this template and posting on the CFP website and reference to the template in the Annex of the US FDA Food Code.

4. Committee Issue #4: SPCC 4 – SHSP HACCP Template for Curing as a Single Special Process – request approval of this template and posting on the CFP website and reference to the template in the Annex of the US FDA Food Code.

5. Committee Issue #5: SPCC 5 – SHSP HACCP Template for Sushi Rice Acidification – request approval of this template and posting on the CFP website and reference to the template in the Annex of the US FDA Food Code.

Committee Name: Special Process Committee (Council 3)		Position (Chair/Member)	Constituency	Employer	City	State	Telephone	Email
Last Name	First Name	Chair	Academia	Utah State University	Logan	UT	4357972116	brian.nummer@usu.edu
Lindholm	Jeffrey	member	Food Industry Support	iCertainty	Baltimore	MD	4434521950	jeff.lindholm@icertainty.com
Curtis	Robert	member	Food Service Industry	Starbucks Coffee Company	Seattle	WA	4155426064	rcurtis@starbucks.com
Elluru	Mahati	member	Food Service Industry	restaurant depot	college point	NY	4089541110	melluru@jetrorrd.com
Kaesontae*	Betsy	member	Food Service Industry	Consultant	Lebanon	TN	6152354271	kaesontae3@aol.com
Martin	Eric	member	Food Service Industry	Texas Roadhouse	Louisville	KY	5025157382	ericm@texasroadhouse.com
Markulin	Kristine	member	Retail Food Industry	Delhaise America	Reston	VA	7033472072	krismarkulin@yahoo.com
O'Donnell-Cahill	Kathleen	member	Retail Food Industry	Wegmans Food Markets, Inc.	Rochester	NY	5854293623	kathleen.odonnell-cahill@wegmans.com
Oswald	Steve	member	Retail Food Industry	Wakefern Food Corp.	Elizabeth	NJ	9085273624	Steve.Oswald@wakefern.com
Pineda	Figor	member	Retail Food Industry	Publix Super Markets	Miami	FL	3056531806	fegor.pineda@publix.com
Puente	ERIC	member	Retail Food Industry	Whole Foods Market	Austin	TX	2103918462	eric.puente@wholefoods.com
Willis	Richard		Retail Food Industry	Mandalay Bay Hotel	Las Vegas	NV	702-632-9485	rwillis@mandalaybay.com
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Petro	Rebecca	member	Local Regulator	Williamson Co. and Cities Health District	Georgetown	TX	5129433620	rpetro@wcchd.org
Bryant	Veronica	member	State Regulator	C Department of Health & Human Services	Raleigh	NC	704 718 7866	veronicambryant@gmail.com
Colson	Matthew	member	State Regulator	FDACS	Tallahassee	FL	8502455544	matthew.colson@freshfromflorida.com
Hawkins	Brian	member	State Regulator	Oregon Department of Agriculture	Salem	OR	5039864720	bhawkins@oda.state.or.us
Hendren	Pamela	member	State Regulator	CHFS/DPH/DPHPS/Food Safety	Frankfort	KY	5025647181	pamelam.hendren@ky.gov
Krzyzanowski	Rebecca	member	State Regulator	Michigan Department of Agriculture	Roscommon	MI	5177197919	krzyzanowskir@michigan.gov
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Pearson	Peri	member	State Regulator	Virginia Department of Health/OEHS	Richmond	VA	8048647463	Peri.Pearson@vdh.virginia.gov
Sparks	Christopher	member	State Regulator	Texas Department of State Health Services	Austin	TX	5128346770	christopher.sparks@dshs.state.tx.us
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Nair	Priya	At Large	State Regulator	Georgia Department of Public Health	Atlanta	GA	4046576534	priya.nair@dph.ga.gov
Pohjola	Carrie	At large	State Regulator	State of Wisconsin Department of Health Services	Madison	WI	7155799487	Carrie.Pohjola@wisconsin.gov
VanEss	Erica	At Large	State Regulator	State of Oregon	Portland	OR	9716730446	erica.vaness@state.or.us
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2018 Conference for Food Protection “Single Hazard Special Process HACCP Template” Guidance Document

Purpose: The **Single Hazard Special Process HACCP Template** is a partially pre-filled and fill-in the blank HACCP template. The template functions to assist both operators in creating a Single Hazard Special Process HACCP and regulators with reviewing and approving these plans. This guide has been created to help the Conference Executive Board, or a committee working on their behalf to apply some basic standards to a **Single Hazard Special Process HACCP Template** so that it may be approved, endorsed and published for public use.

Use of this Guidance: This document was written to capture some of the discussions that took place in the Council III Special Process Control Committee (2016-2018). It is intended for Guidance that can be used for future **Single Hazard Special Process HACCP Templates**. The following information is not intended to set rules or requirements.

Application: Single Hazard Special Process HACCP Templates are intended only with simple HACCP required process. Simple would include single hazard processes or single critical control point processes. Certain control measures that are well-defined in the US FDA model Food Code that are already required outside of the Special Process are not included: e.g. refrigeration, cooking, or hot holding for service. Examples of templates are sushi rice acidification (using an additive to render a Time/Temperature Control for Safety Food (TCS) to non-TCS), vacuum packaging raw meats, and adding curing compounds to foods for culinary reasons (not for food safety).

Complex HACCP plans that include multiple control points not defined in the US FDA model Food Code should not be made into templates. The main reason is that more complex processes will have more variability. These more complex HACCP plans must be specific to a food facility. Examples of more complex processes that should not be made into templates include; cured and fermented meats, sous vide as a Reduced Oxygen Packaging (ROP), and cook-chill (ROP). Scrutiny should be made upon any process with more than one Critical Control Point (CCP).

Foundations: Single Hazard Special Process HACCP Templates must be science-based and applicable to the US FDA model Food Code. All critical limits and corrective actions should be based on current US FDA model Food Code control measures or current FDA or USDA control measures. The end-product of completing a **Single Hazard Special Process HACCP template** should be equal to or better than a fully developed Food Code HACCP plan.

How does a Single Hazard Special Process HACCP Template differ from a full Food Code HACCP Plan?

A **Single Hazard Special Process HACCP Template** MUST contain all of the required HACCP information as found in section 8-201.14 of the US FDA model Food Code. However, some sections may be pre-filled. If an operator’s process deviates from the template they may **not** use that template. For the remainder of this guidance document section 8-201.14 - “Contents of a HACCP Plan” from 2013 FDA model Food Code Supplement is provided with an underline guidance for what would suffice in a developed template below the language from the current FDA Food Code.

[see next page]

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§8-201.14 Contents of a HACCP Plan.

For a FOOD ESTABLISHMENT that is required under § 8-201.13 to have a HACCP PLAN, the PERMIT applicant or PERMIT HOLDER shall submit to the REGULATORY AUTHORITY a properly prepared HACCP PLAN that includes:

A regulator may choose to provide an operator an option to use a **Single Hazard Special Process HACCP Template**. Operators wishing to use Template should first get approval from their regulatory authority.

- (A) General information such as the name of the PERMIT applicant or PERMIT HOLDER, the FOOD ESTABLISHMENT address, and contact information;

Single Hazard Special Process HACCP Template should provide a fill-in the blank general information section.

- (B) A categorization of the types of TIME/TEMPERATURE CONTROL FOR SAFETY FOODS that are to be controlled under the HACCP PLAN;

A **Single Hazard Special Process HACCP Template** may only be one category of a special process. They are not intended for any complex process or product. It is expected that the template would indicate the category with strict conditions for its use.

- (C) A flow diagram or chart for each specific FOOD or category type that identifies:

- 1) Each step in the process;
- 2) The HAZARDS and controls for each step in the flow diagram or chart;
- 3) The steps that are CRITICAL CONTROL POINTS;

The **Single Hazard Special Process HACCP Template** should have a simple flow diagram of a standardized special process. If an operator's process deviates from the standard, they may **not** use the template.

- 4) The ingredients, materials, and equipment used in the preparation of that FOOD; and
- 5) Formulations or recipes that delineate methods and procedural control measures that address the FOOD safety concerns involved.

The **Single Hazard Special Process HACCP Template** should have guidance for operators to fill-in or complete (a) materials and equipment list and (b) recipes with an ingredient list or formulation details.

- (D) A CRITICAL CONTROL POINTS summary for each specific FOOD or category type that clearly identifies:

- 1) Each CRITICAL CONTROL POINT,
- 2) The CRITICAL LIMITS for each CRITICAL CONTROL POINT,

The **Single Hazard Special Process HACCP Template** should have CCPs identified with standardized critical limits taken from the US FDA model Food Code. If an operator's critical limits deviate from the standard, they may not use the template.

- 3) The method and frequency for monitoring and controlling each CRITICAL CONTROL POINT by the designated FOOD EMPLOYEE or the PERSON IN CHARGE,

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- 4) The method and frequency for the PERSON IN CHARGE to routinely verify that the FOOD EMPLOYEE is following standard operating procedures and monitoring CRITICAL CONTROL POINTS,

The **Single Hazard Special Process HACCP Template** should have guidance for operators to fill-in or complete (a) their SPECIFIC methods for monitoring and (b) verification used by the operator. Measuring device calibration log may be provided as a template along with a standard operating procedure template (process and blank record).

- 5) Action to be taken by the designated FOOD EMPLOYEE or PERSON IN CHARGE if the CRITICAL LIMITS for each CRITICAL CONTROL POINT are not met, and
- 6) Records to be maintained by the PERSON IN CHARGE to demonstrate that the HACCP PLAN is properly operated and managed;

The **Single Hazard Special Process HACCP Template** should have corrective actions identified for each CCP and provide a sample record form. If an operator's corrective actions deviate from the standard, they may not use the template. An alternative record form would be acceptable.

(E) Supporting documents such as:

- 1) FOOD EMPLOYEE and supervisory training plan that addresses the FOOD safety issues of concern;
- 2) Copies of blank records forms that are necessary to implement the HACCP PLAN;
- 3) Additional scientific data or other information, as required by the REGULATORY AUTHORITY, supporting the determination that FOOD safety is not compromised by the proposal.

(F) Any other information required by the REGULATORY AUTHORITY

The **Single Hazard Special Process HACCP Template** may have a supporting documents section. Alternatively, individual Regulatory Authorities may simply define the supporting documentation they specifically need.

Three attached **Single Hazard Special Process HACCP Templates** have been submitted to the 2018 Biennial Meeting and can be used as guidance for future templates.

Important: Ultimately, a completed (filled-in) **Single Hazard Special Process HACCP Template** MUST meet all of the required document and implementation requirements in the FDA Food Code section 8-201.14.

Single Hazard Special Process HACCP Template for Reduced Oxygen Packaging: Raw Meat, Cheese, Frozen Fish

Regulatory Agency Jurisdiction NAME (fill in form)

Date Submitted _____ Date Approved _____ Valid until _____

A. General Information

This is a placeholder for the general information needed: e.g. operator name, location, Person-in-Charge (PIC) name, contact information, etc.

fill in form

B. Categorization – Recipe(s)

Categorization: Reduced Oxygen Packaging (ROP).

A food establishment is required to have a HACCP plan in place for Reduced Oxygen Packaging for following the processes under the most recent edition of the FDA Food Code §3-502.12. This plan will act as the HACCP template to meet the requirements of FDA Food Code §8-301.11

B.1. Are there any buyer specifications (supply controls) or special equipment required/recommended?

Made/Assembled in house. List Products _____

Note: Recipe and Products must be listed in C. Flow Diagram – Chart below

Commercially purchased. List Products: _____

B.2. This plan includes the following processes; include all products or recipes (use additional attachments if needed)

C. Flow Diagram-Chart

[Instructions] – Add each step in your Reduced Oxygen Packaging process in the following table starting in box 1.

The first step should be receiving ingredients and the last step consumption or sale of the ROP products.

1 Receiving Ingredients and any other materials	2	3
4	5	6
7	8	9
10	11	12
13	14	Last- consumption (foodservice) or sale to consumer (retail)

C. 1. Hazard.

The main hazards in Reduced Oxygen Packaging are *Clostridium botulinum* and *Listeria monocytogenes*. *Clostridium botulinum* is a spore forming, strict anaerobic bacteria that causes the severe foodborne illness known as botulism. If not controlled with pH, water activity, or time/temperature it will thrive in a reduced oxygen environment. *Listeria monocytogenes* is a psychotropic bacteria that will grow under refrigeration temperatures in a reduced oxygen environment. Both organisms have been known to cause foodborne illnesses over the years, and require multiple hurdles to control growth and/or toxin production.

C. 2. Control.

For raw meats, and cheeses, the competitive microflora, along with time/temperature control is required to prevent growth of *Clostridium botulinum* and *Listeria monocytogenes*. Refrigeration requirements to control for these two organisms need to be based on laboratory data or the requirements found in section 3-502.12 of the 2013 FDA model Food Code. Additionally, use-by dates that are either within manufactures dates or determined for safety using laboratory data must be included on the ROP packaging. Information on time frames for use-by dates can also be found in section 3-502.12 based on temperature information. If being sold to consumers in ROP packaging, foods must be labeled with either "Important- Must be kept refrigerated at 5°C (41°F)" or "Important – Must be kept frozen". Fish is especially important to remain frozen before, during, and after since *Clostridium botulinum* type E is ubiquitous in marine environments and found in the digestive tract of most fish species. Labeling must be included to indicate such, i.e. "Open prior to thawing", on the principle display panel.

D. Critical Control Point (CCP) Summary

D.1. Critical Limit(s)

Temperature Control:

Required Temperature(s), list separately if more than one required: _____

Labeling:

Required time frame (i.e. no more than 30 days or manufactures date for cheeses), list separately if more than one required: _____

_____:

D.2. Monitoring

Temperature logs: How often? _____ Whom? _____

Labeling: How often? _____ Whom? _____

D.3. Corrective actions

Temperature monitoring: _____

Labeling: _____

D.4. Verification

The PIC is responsible for reviewing and signing the temperature monitoring log. PIC should also observe employees for performing the thermometer calibration and measurement and recording required data periodically. Make those observation notes on required monitoring logs.

D.5. Validation *not required*

D.6. Record

A temperature monitoring log is required as part of this plan. Temperature measurements in time frames indicated, corrective actions, and supervisor verifications is kept on this single form. Once records are created they MUST be kept for 6 months and made available to the Regulatory Authority upon inspection request.

E. Training

Each employee who will have responsibility for making and measuring curing salts is REQUIRED to receive training such that they understand the hazards and controls and that they may perform their

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role in this **Single Hazard Special Process HACCP Template**. THE PIC must review section C and D with employees and complete a hands-on training for section D. Provide a training log form as an attachment to this **Single Hazard Special Process HACCP Template**. The training sessions must be recorded in this log, and must include date, employees present, and instructor. Maintain the training log as an additional appendix to this **Single Hazard Special Process HACCP Template**

F. Standard Operating Procedures

For the Regulatory Authority to list. Are there any SOPs required or recommended that will make this **Single Hazard Special Process HACCP Template** safer? I.e: cleaning and sanitizing food contact surfaces, personal hygiene, hand washing, eliminating bare hand contact, proper chemical/nitrite storage

G. Logs

Submit required logs as attachments (For review by Regulatory Authority):

Temperature monitoring

Thermometer calibration

Training

(Any additional required logs)

Signature

_____ *print name*, as the Person in Charge of _____, do certify that the above food safety plan will be fully implemented as written above.

_____ Signature _____ Date

_____ = operator fill in places.

--Attach a blank copy of required logs and a blank copy of a training log to this *Single Hazard Special Processes HACCP Template*.

Single Hazard Special Process HACCP Template for

Curing as a Single Special Process

Regulatory Agency Jurisdiction NAME (fill in form)

Date Submitted _____ Date Approved _____ Valid until _____

A. General Information

This is a placeholder for the general information needed: e.g. operator name, location, Person-in-Charge (PIC) Name, contact information, etc.

fill in form

B. Categorization – Recipe(s)

Categorization: **Template for Curing as a Single Special Process**

2013 FDA Food Code Section 3-502.11: “A *FOOD ESTABLISHMENT* shall obtain a *VARIANCE* from the *REGULATORY AUTHORITY (RA)* as specified in §8-103.10 and under §8-103.11 before: (B) *Curing food.*”

This template is to be utilized for raw food that will follow US FDA model Food Code parameters for cooking, cooling and cold storage. This template is not intended for products where additional critical control points (CCPs)/variances would be needed (for example, products with a fermentation or drying step or products where slow cooling is used).

Recipe: *Attach recipes of all current and future meat and poultry products containing sodium nitrite to this document (see C2 Control below) [label as attachment 1].* Product must contain a minimum of 120ppm ingoing nitrite. The use of nitrate is not permitted (under this Special Processes HACCP template). Only curing salt mixtures, which contain sodium chloride (NaCl) with 6.25% sodium nitrite, are permitted. The curing salt mixture must be dyed pink so that it cannot be confused with common salt. The curing salt mixture must be stored in a safe and secure place. Appropriate labeling must remain on the packaging. *Attach copy of label or certificate of analysis for curing salt mixture [label as attachment 2].*

Are there any buyer specifications (supply controls) or special equipment required/recommended?

<input type="text"/> Calibrated scale for weighing curing salts (brand and model <input type="text"/>) <input type="text"/> 6.25% sodium nitrite (brand <input type="text"/>)
--

C. Flow Diagram-Chart

[Instructions] – Add each step of the process in the following table starting in box 1. The first step should be receiving ingredients and the last step consumption or sale of the product.

1 Receiving Ingredients and any other materials	2	3
4	5	6
7	8	9
10	11	12
13	14	Last- consumption (foodservice) or sale to consumer (retail)

The step in which curing agent is added to the meat/poultry for curing is number . This is the critical control step in the template. Mark that step above with the designation “CCP”.

C. 1. Hazard.

The main hazard in curing is the concentration of the curing agent; too much may result in chemical contamination of the food and/or nitrite poisoning of the consumer. Signs and symptoms of nitrite poisoning include prompt fall in blood pressure, headache [which is persistent and throbbing], intense cyanosis, nausea, vertigo, vomiting, collapse, spasms of abdominal pain, tachycardia, tachypnea, coma, convulsions and death. Too little could result in the potential growth of *Clostridium botulinum* (*C. botulinum*). For *Clostridium botulinum*, if enough vegetative cells are produced during temperature abuse, toxigenesis can occur in the product. The toxin is not destroyed at the minimum required cooking temperatures.

C. botulinum can cause symptoms such as weakness, vertigo, double vision, difficulty in speaking, swallowing and breathing, abdominal swelling, constipation, paralysis, and death. Symptoms start from 18 hours to 36 hours after consumption. *C. botulinum* is considered a hazard for various reasons. It is a spore forming foodborne illness bacteria and those spores are commonly found in the viscera of fish, on raw meat and poultry products, as well as spices and herbs, and in soil and water. Additionally, those spores can survive the cooking step therefore when cooling, the spores can germinate and grow into vegetative bacteria producing toxin that can cause illnesses. Outbreaks of *C. botulinum* foodborne illness have occurred in sausage, fermented meat, and smoked fish. The CDC confirms multiple cases of foodborne illness caused by *C. botulinum* each year.

C. 2. Control.

The main control that prevents the growth of *C. botulinum* in this type of process is nitrite concentration. NOTE: Proper cooking, cooling, and cold storage according to the FDA Model Food Code must also be followed (see above section B). The control for nitrite poisoning is regulating the concentration of nitrite added to the food. Proper concentrations of sodium nitrite and adequate holding temperatures prohibit the outgrowth of *C. botulinum* vegetative cells and spores. The addition of curing salts is an effective control as long as the concentration is at proper levels. It is essential that a calibrated scale be used to measure the curing salt and the curing salt is evenly distributed. Accurate measurement of the curing salt using a properly calibrated scale and uniform distribution of the nitrite throughout the meat/poultry ensures this control measure produces a safe product.

The following is permitted for this process:

The operator must use an ingoing minimum of 120ppm sodium nitrite in meat or poultry recipes, or the operator will use the amounts permitted by the USDA per 9 Code of Federal Regulations (CFR) 424 (see chart below). Each recipe shall indicate the exact pre-determined quantity of pink curing salt that targets the minimum ingoing sodium nitrite of 120ppm for the meat or poultry, or each recipe shall indicate the exact pre-determined quantity of pink curing salt that targets the appropriate product category as detailed in 9 CFR 424 (see chart below). The permitted amounts in the chart below cannot be exceeded and are considered the maximum amount allowed for sodium nitrite in the recipes.

To calculate the amount of ingoing sodium nitrite for each recipe, the facility must use the proper formulation calculations, such as the calculations found in the USDA FSIS processing inspectors' calculations handbook. The health authority will use the submitted recipes to calculate the ingoing amount of nitrite in the food to ensure a minimum ingoing concentration of 120ppm sodium nitrite or that the amount of sodium nitrite does not exceed the permitted amount of sodium nitrite per 9 CFR 424.

Choosing this option does not require lab nitrite verification.

<p align="center">USDA Guidance for usage of cure mix No. 1 in meat or poultry Cure Mix No. 1. - 6.25% nitrite in NaCl</p>

	Immersion (+12 gal water)	Comminuted	Dry Rub	Bacon Immersion (+12 gal water)	Bacon Dry Rub
Nitrite ppm critical limit	200	156	625	120	200
<i>The nitrite critical limit comes from USDA requirements in 9 CFR 424. The cure No.1. mix in ounces by weight is only valid for cure mixes of 6.25% nitrite and 93.75% salt.</i>					

Cure dry rubs can be applied and the food wrapped in plastic or placed inside a plastic zip style bag. Cure brine and food can be mixed in a food safe bin with a lid. Dry rubs or brines should not be reused and should be immediately discarded after use. Dry cure especially, and brine cure, MUST be rinsed off just prior to use (cooking). The product is NOT permitted to be stored in reduced oxygen packaging (ROP).

NOTE: The cured food must be held at 41F or below prior to the cooking process. A shelf life of 7 days or less is calculated after the cooking process takes place, i.e., once the product is a ready to eat food (as per section 3-501 of the FDA Food Code).

- Reference: FDA Food Code. Section 3-501.17, Page 92 and Appendix 6, Section 3, Pages 634-641. www.fda.gov
- Reference: National Library of Medicine Hazardous Substances Data Base, Sodium nitrite www.nlm.nih.gov
- Reference: Centers of Disease Control and Prevention (CDC), Botulism www.cdc.gov
- Reference: FSIS Processing Inspectors Calculations Handbook www.fsis.usda.gov

D. CCP Summary

D.1. Critical Limit(s)

The curing salt must be accurately measured. FSIS recommends a minimum of 120ppm of ingoing nitrite in all cured “Keep Refrigerated” products.

D.2. Monitoring

Each batch of product must be measured using a calibrated scale. Document weight of product and curing salt on the curing log. The salt must be evenly distributed by mixing into comminuted ground meat, coating the exterior with a dry rub, or completely submerging in brine. The cured product must be stored at 41F or below.

D.3. Corrective Action

If the curing salts are not measured properly according to the recipe, repeat the measurement of the curing salts. If the improperly measured curing salts were added to meat/poultry, the meat/poultry must be discarded. The corrective action taken must be documented on the curing log.

D.4. Verification

The PIC or a designee is responsible for reviewing and signing the curing log daily when the process is conducted. The PIC should also observe employees performing the measurement and recording required data periodically. Document observation notes on the curing log.

D.5. Validation

Per the USDA FSIS, curing agents are considered to have multiple functions including inhibiting rancidity in cured meats, fixing the color of cooked cured meats by forming a heat stable form of myoglobin; and retarding the outgrowth of *C. botulinum*, thus preventing formation of the toxin that causes botulism. For this reason, as a general rule, the USDA FSIS recommends a *minimum* of 120 ppm of ingoing nitrite in *all* cured "Keep Refrigerated" products. To ensure that a minimum ingoing amount of 120ppm sodium nitrite is in the product or to ensure the amount is as permitted per 9 CFR 424, the facility must attach recipes (including ingredients and amounts of ingredients). The recipes will be used by the health authority to calculate the ingoing amount of nitrite in the food.

D.6. Record

Provide a blank curing log used for monitoring the measurement of each batch of cured product as part of this document. A record of scale calibration, curing salt measurements, corrective actions, and supervisor verifications is kept on this single form. Specifically, the following information must be included on the log: Date, Scale Calibration, Recipe name, Weight of Curing Salts, Weight of Meat/Poultry, Brine amount, Other ingredients, Corrective Action, Initials or Signature of the Processor and Initials or Signature of the Person in Charge.

Note: Once records are created they MUST be kept for 6 months and made available to the RA upon inspection request.

E. Training

Each employee who will have responsibility for making and measuring curing salts is REQUIRED to receive training such that they understand the hazards and controls and that they may perform their role in this **Single Hazard Special Process HACCP Template**. THE PIC must review section C and D with employees and complete a hands-on training for section D. Provide a training log form as an attachment to this **Single Hazard Special Process HACCP Template**. The training sessions must be recorded in this log, and must include date, employee name in attendance, and instructor. Maintain the training log as an additional appendix to this **Single Hazard Special Process HACCP Template**.

F. Standard operating procedures

For the Regulatory Authority to list. Are there any SOPs required or recommended that will make this **Single Hazard Special Process HACCP Template** safer? **Such as: cleaning and sanitizing food contact surfaces, personal hygiene, hand washing, eliminating bare hand contact, proper chemical/nitrite storage**

Signature

_____ *print name*, as the person in charge of _____, do certify that the above food safety plan will be fully implemented as written above.

_____ Signature _____ Date

_____ = operator fill in places.

*--Attach a blank copy of a curing log and a blank copy of a training log to this **Single Hazard Special Processes HACCP Template**.*

Single Hazard Special Process HACCP Template for Sushi Rice Acidification

Regulatory Authority Jurisdiction NAME (fill in form)

Date Submitted _____ Date Approved _____ Valid until _____

A. General Information

This is a placeholder for the general information needed: e.g. operator name, location, Person-In-Charge(PIC) name, contact information, etc.

fill in form

B. Categorization – Recipe(s)

Categorization: **Template for Sushi Rice Acidification**

FDA Food Code Section 3-502.11: “A FOOD ESTABLISHMENT shall obtain a VARIANCE from the REGULATORY AUTHORITY (RA) as specified in §8-103.10 and under §8-103.11 before: (C)Using FOOD ADDITIVES or adding components such as vinegar: (2) To render a FOOD so that it is not TIME/TEMPERATURE CONTROL OF SAFETY FOOD.” Thus, allowing the food to be stored at temperature between 41°F and 135°F for more than 4 hours.

Recipe: *Attach the recipe for your sushi rice to this document and a certified lab analysis of that recipes pH. Attach additional recipes/lab analyses for each different sushi rice recipe.*

Are there any buyer specifications (supply controls) or special equipment required/recommended?

pH meter with 0.1 pH accuracy (brand and model _____)
 pH 4.0 or 4.01 calibration buffer (brand _____)
 vinegar (percent _____)

C. Flow Diagram-Chart

[Instructions] – Add each step in your sushi rice acidification process in the following table starting in box 1. The first step should be receiving ingredients and the last step consumption or sale of the sushi rice.

1 Receiving Ingredients and any other materials	2	3
4	5	6
7	8	9
10	11	12
13	14	Last- consumption (foodservice) or sale to consumer (retail)

The step in which vinegar is added to the rice for acidification is number . This is the critical control point for this **Single Hazard Special Process HACCP Template**. Mark that step above with the designation “CCP” to indicate that as a Critical Control Point (CCP)

C. 1. Hazard.

The main hazard in sushi rice held at room temperature is the presence of and potential growth of *Bacillus cereus* (*b. cereus*). *B. cereus* can cause vomiting and diarrhea if permitted to grow to high numbers in the rice. *B. cereus* is considered a hazard in sushi rice for several reasons: 1. It is a spore forming foodborne illness bacteria; 2. Spores are often found in rice and grains; 3. Spores survive the rice cooking step; 4. After cooling, the spores can become growing bacteria producing toxins that cause the illnesses; 5. Sushi rice is typically kept warm in the temperature danger zone of 41-135°F; 6. Outbreaks of *B. cereus* foodborne illness have occurred in sushi rice.

C. 2. Control.

The main control that prevents the growth of *B. cereus* is acidification. *B. cereus* does not grow at pH levels of 4.3 or below*. Therefore, vinegar is typically mixed well into sushi rice to reduce the pH of the rice to 4.3 or below. This control is effective only when the pH of the rice is

correctly monitored by using a pH meter. Proper execution of the pH measurement as well as verification that the pH meter is accurate or calibrated ensures this control measure is effective the sushi rice is safe.

* Reference: US FDA Seafood HACCP Guide. Appendix 4. Page 420. April 2011 www.fda.gov

D. CCP Summary

D.1. Critical Limit(s)

The rice must be acidified using vinegar (any variety) to a pH of 4.3 or less.

D.2. Monitoring

Each batch of acidified rice must be measured for pH as follows. Prepare rice according to the approved directions. Mix exceptionally well. Prepare and calibrate the pH meter according to the manufacturer's directions. Record the calibration of the pH meter in the log. Remove 100 grams (or ___ cup) acidified rice to a large plastic zip style baggie. Add 900 ml distilled water (tap water is not suitable). Seal the plastic bag and hand-massage the rice-water mixture for 1 minute. Insert the calibrated pH meter probe into the rice-water. Note the pH measurement. If the pH is at or below 4.3 record that pH in the log. Clean/rinse the pH probe as recommended by the manufacture before further use or storage.

D.3. Corrective Action

If the pH of the measurement is greater than (>) 4.3; then repeat the measurement with a new sample. If that is greater than (>) 4.3; add more vinegar to the acidified rice. Mix well. And repeat the pH measurement. Repeat this corrective action until the pH is at or below 4.3. Note the corrective actions applied in the log.

D.4. Verification

The PIC (person in charge) is responsible for reviewing and signing the sushi rice acidification log daily. The PIC should also observe employees for performing the pH measurement and recording required data periodically. Make those observation notes on the pH log.

D.5. Validation

not required

D.6. Record

Provide a blank pH verification log for monitoring each batch of sushi rice as part of this document. A record of pH meter calibration, pH measurements, corrective actions, and PIC verifications must be kept on this single form.

Note: Once records are created they MUST be kept for 6 months and made available to the Regulatory Authority upon inspection request.

E. Training

Each employee who will have responsibility for making and measuring curing salts is REQUIRED to receive training such that they understand the hazards and controls and that they may perform their role in this **Single Hazard Special Process HACCP Template**. The PIC must review sections C and D with employees and complete a hands-on training for section D. Provide a training log form as an attachment to this **Single Hazard Special Process HACCP Template**. The training sessions must be recorded in this log, and must include date, employees present, and instructor. Maintain the training log as an additional appendix to this **Single Hazard Special Process HACCP Template**.

F. Standard operating procedures

For the Regulatory Authority to list. Are there any SOPs required or recommended that will make this **Single Hazard Special Process HACCP Template** safer? *I.e:* **cleaning and sanitizing food contact surfaces, personal hygiene, hand washing, eliminating bare hand contact, proper chemical/nitrite storage**

Signature

_____ print name, as the person in charge of _____, do certify that the above food safety plan will be fully implemented as written above.

_____ Signature _____ Date

_____ = operator fill in places.

--Attach a blank copy of pH log and a blank copy of a training log to this Single Hazard Special Processes HACCP Template.

Notes From Special Processing Committee – August 7, 2017

Kathleen O'Donnel; Rob Erwin; Brian Hawkins; Meryl Silverman; Matt Colson; Erica Vaness; Rebecca Krzyzanowski; Brian Nummer; Keith Jackson; Davene Saracco-Smith; Emati

? two last people couldn't catch the name

Brian asked the following from co-chair:

Would like Sub-committee to reconvene – create rules for CFP to use the templates.

Send out email vote for name change as requested from Sub-committee

Changed the date for the next phone call to Sept 11th, 2017

Issue Submission and Timeline thoughts:

Templates will get submitted as separate issues – Board to house

Separate issue – Introduction and link in FDA Food Code Annex (created by sub-committee)

ACTION ITEM: Separate issue – How CFP could use/house the template. (to be created by sub-committee in Sept/Oct call)

ACTION ITEM: Have to start writing Issue for November voting, so that can go to Council Chairs – Work to be done in Sept – October

Discussion on Templates: Comments from committee

USDA/FSIS – Comments

1. No issues with ROP of raw meat, cheese and fish.
2. Issues with Culinary cure
 - a. Multiple CCPs in place, so would like to see them all in place in the template
 - b. Template does not address low level of Nitrate – the minimum in going

Suggest that this template be limited to either raw, ready to cook foods where nitrite/nitrates are added. – Problem may be same food items (fresh sausages, corned beefs etc) are handled differently between Food Service and Retail. Raw, intended Ready to Cook food items as part of introduction.

Could limit in the introduction that this template has to be used with all other Food Code parameters. Therefore if another parameter is wanted, then they would revert back to traditional HACCP/Variance requirements of the Code.

Need guidance in beginning or ending for clarification on when these can be used.

Give comments to Nikki Burns-Savage

Sushi Rice – Comments

Nothing from committee participants.

ROP raw meats, cheeses, and frozen.

1. Include in narrative – grill marks – as excluded
2. Marinades, dry rubs, fresh garlic, or heat treated plant foods. – Marinades acceptable? Rest not? Need further information.
3. Email response regarding freezing before, after, during – that was for Frozen Fish as Code requires. No further comments

Ask USDA FSIS and FDA and concerns with use of marinades, dry rubs, etc

Give comments to Becky Krzyzanowski

Criteria for housing Templates

1. Use as intended and created (alterable or non-alterable)
2. Set rules as a group of templates – Separate issue – Would like CFSAN input
3. CFP endorsement? But how do they get updated?
 - a. Currently submitted through Council with an action to Endorse and make available
 - b. Proposed changes would then go to author through the CFP board and then up to CFP board to change – elevates need to go through entire Council process.
4. Creation of future templates – create a committee? Or is there another method. So, would this be a standing committee? Would it just be for templates or any publications? Ad hoc committee – meet when required only reports to board when there is work (preferred by committee)

Special Process Controls Committee Notes 9.11.2017

Committee Members Present

Richard Willis, Peri Pearson, Nikki Burns-Savage, Robert Sudler (in for Veronica Moore), Carrie Pohjola, Brian Hawkins, Erika (FSIS), Brian Nummer, Rebecca Krzyzanowski

Culinary Cure:

Concentration: from 75 ppm to 120 ppm. No other changes needed, all other Food Code parameters for time/temperature control will need to be followed.

Raw Meat:

Added in the box requirement to add products that have grill marks, spices, seasonings, herbs or marinades are used. Still waiting for information from FSIS and FDA as to whether these could be ROP with HACCP only. Changes to template will be made based on that information back. (Brian has done some mini lab testing, marinades does not seem to effect natural flora)

Will send these revised templates out to the committee today.

Issue submission needs to be completed prior to November 1, 2017, so that we can submit Issues to Council Chairs on November 1st. Two more full committee calls, October 9th and October 23rd.

Issue1: Report and Disbanding the committee

Issue 2: Introduction or Reference in the Food Code to use of templates

Note: Listeria Committee asked for both guidance document to be published by CFP, and for the reference of the document be made in Annex 2. Do we just want that or do we want additional language in Annex 6.

Issue 3: Three templates (should these be separate issues) **Ask for Davene and Keith's advice**

Issue 4: Methodology for new templates (possible use publication committee with some defined terminology). Sub-committee did some work on what the template should contain. This will be sent to on to Brian. Sub-committee will reconvene to once again discuss how to place language into the Food Code. Available dates are Sept 22nd, Sept 25th, Sept 28th, a doodle poll will be sent out. Also need to discuss whether or not language that defines these are single-hazard (outside of food code parameters) and that all the elements of a HACCP plan need to be included (this is not reduced HACCP or templated HACCP)

Need to have a timeline established. All 4 (or 6) Issues need to be done by October 9th, so that we can get committee review and comments prior to final call on October 23rd for wrap up of committee and final votes.

Special Process Control Committee Notes: 10.2.17

Members on Call: Rebecca Krzyzanowski, Peri Pearson, Brian Nummer, Keith Jackson, Mahati Elluru, Erica Vaness, Nikki Burns Savage, Richard Willis, Brian Hawkins, Veronica Moore, Mario Seminara, Meryl Silverman, Jeff Lindholm, Lori LeMaster, Carrie Pohjola

Discussion on Culinary Curing – Template

Changed to 120 ppm per last call.

Question from FSIS – Culinary curing – Term not used in Food Code or by FSIS so may be confusing. Need to maybe clarify so that it is understandable, that this is for only foods that will follow all other Food Code parameters. Cooking, cooling, date-marking, cold holding. Trying to communicate that it is for only food items that are cured for color or flavor, not for preservation. Concerned with packaging for retail and being labeled as cure that consumer may take that literally for preservation

ACTION ITEM : We will work as a small group to get that cleared up. Nikki, Brian, Veronica, Meryl, and Mario.

Questions on the Template from FDA on how we would know that the Curing agent is in the correct amount? The templates are specific for recipe. We are not defining the amounts that are needed, they need to provide their information for review and provide their own documents for logging.

Subcommittee work – Annex placement.

Brian's document captures much of the work that was done by subcommittee in his issue document 3 to 5. Would like to incorporate that language into an introductory statement for CFP document and to then have that document referenced in Annex 2 of the FDA Food Code.

ACTION ITEM: Brian and Rebecca will work on this before next call

Need to have everything done prior to October 23rd phone call. Will send out prior to meeting. Do a voice call on that phone call and rest will done by email vote.

ACTION ITEM: All documents ready to go to Council Chairs prior by October 31, 2017

Special Process Controls Committee Notes 10.23.2017

Oct 23rd CFP Special Processing Committee phone call: VOTING CALL

Members Present: Rebecca Krzyzanowski, Brian Nummer, Nikki Burns-Savage, Matt Colson, Erica VanEss, Richard Willis, Veronica Moore (FDA rep), Carrie Pojhola, Brain Hawkins, Jeff Lindholm, Meryl Silverman (USDA Rep), Robert Curtis. Fegor Pineda, Keith Jackson

Member Absent: Peri Person,

Two issues to resolve:

1) Terminology of culinary cure and changes made to the template to capture intent

Suggestions from USDA made in template. Updated previously from 75 ppm to 120 ppm as a minimum ingoing. Still have an option for a lab testing, which is creating confusion, since its for residual only not ingoing cure. Therefore, template should only have the calculation for a in going with a minimum of 120 ppm with no more maximum than Cure Mix No 1 permitted from USDA 9 CFR 424. All lab testing options will be removed.

Also making revisions to B – to remove options listed

USDA still not satisfied with the terminology of Curing for color and flavor only. Leaning towards curing as single special process. So remove the terminology for “color and flavor only”.

Under the note: “A shelf life of 7 days or less is permitted” needs to be clarified as a 7 days after cooking. Add the Food code reference for date-marking.

Additionally, remove the long-term storage on the line that states “The product is NOT permitted to be stored in reduced oxygen packaging (ROP)”

2) How and where to place templates and reference in the Annex of the Food Code

- a. As a reference in Annex 2 listed under CFP issues 3 to 5. FDA’s suggestion is to make it a general statement asking FDA to place in Annex to give the flexibility to be placed in most appropriate place in the code.

3) Question on Raw meats and the use of marinades, spices, dry rubs and oils in ROP packaging.

- a. Still need more information, published data and Food Code history. FDA is still working on that issues. Food code is not specific for raw meats. USDA does not have guidelines for the use of ROP and spices, marinades etc. They are concerned that some spices have high loads of spores, so they are looking into past scientific data to see if there is information regarding increased risk of C. bot with use of spices, marinades etc.

Vote:

Brian Nummer – Yes all 5

Rebecca Krzyzanowski – Yes all 5

Nikki Burns-Savage – Yes all 5

Matt Colson – Yes all 5

Richard Willis – Yea all 5

Carrie Pohjola – Yes all 5

Brian Hawkins – Yes all 5

Jeff Lindholm – Yes all 5

Robert Curtis – Yes all 5

Fegor Pineda – Abstain until email vote