Conference for Food Protection
2018 Issue Form

Issue: 2018 III-020

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:

Amend Food Code - Reheating RTE Food to be Held Using TPHC

Issue you would like the Conference to consider:

Clarify the requirements for the use of time as a public health control (TPHC) under Food Code Section 3-501.19 when ready-to-eat foods are reheated and then immediately held using time alone as the public health control. This section currently addresses foods cooked and then held using TPHC and implies that foods must be hot held before being held using time alone as the public health control, but it is not clearly specified in the codified language or Annexes. The time requirement of two hours should apply to foods that are reheated and then held using TPHC.

Public Health Significance:

If ready-to-eat foods are allowed to remain in the temperature danger zone for prolonged periods of time during reheating before being held using time as a public health control, pathogens such as *Clostridium perfringens* and *Bacillus cereus* could grow and produce enterotoxins.

Recommended Solution: The Conference recommends...:

that a letter be sent to FDA requesting clarification of Section 3-501.19 to indicate foods reheated prior to being held using time as a public health control must be reheated as specified in Section 3-403.11.

Submitter Information 1:

Name:	Ann Johnson
Organization:	Florida Department of Agriculture and Consumer Services
Address:	3125 Conner Blvd
City/State/Zip:	Tallahassee, FL 32399
Telephone:	850-728-5894
E-mail:	anna.johnson@freshfromflorida.com

Submitter Information 2:

Name:	Joetta DeFrancesco
Organization:	Florida Department of Agriculture and Consumer Services
Address:	3125 Conner Blvd
City/State/Zip:	Tallahassee, FL 32399
Telephone:	850-245-5559
E-mail:	joetta.defrancesco@freshfromflorida.com

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