

**Conference for Food Protection  
2018 Issue Form**

**Issue: 2018 III-021**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

Create Committee - Cooking/Heating Commercially Processed Not RTE Food

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

Determine how commercially processed foods that do not contain any raw animal ingredients but are labeled with safe handling instructions and have cooking instructions because they are considered "not ready-to-eat" by USDA and the manufacturer should be assessed at retail. Attached is a brief explanation from the FSIS website regarding the reclassification of ready-to-eat food as not ready-to-eat food (Reclassification of RTE Food). Also attached are pictures of a case of yuca rellena to demonstrate the issue (Yuca Rellena Label Spanish and Yuca Rellena Label English). The side of the case with Spanish labeling (Yuca Rellena Label Spanish) contains safe handling instructions as well as the ingredients and cooking instructions. The side of the case with English labeling (Yuca Rellena Label English) contains a description of the product (stuffed cassava with beef and pork filling) along with the ingredients and cooking instructions. Nothing on the labeling indicates the product is fully cooked, ready-to-eat, etc. yet the minimum temperature specified in the cooking instructions is not what one would expect for a product stuffed with raw or undercooked meat. After contacting USDA and the manufacturer of the product, it was determined the yuca rellena fell into the category of "not ready-to-eat". The Food Code contains model guidance for cooking raw animal foods, cooking plant foods for hot holding and reheating commercially processed foods for hot holding. However, the cooking/heating of "not ready-to-eat" foods is not addressed. This poses a problem for retail establishments and regulators.

**Public Health Significance:**

If the Food Code requirements for cooking raw animal foods are applied (in this case 165°F for 15 seconds), it indicates the manufacturer's cooking instructions are not adequate even though they were established based upon USDA guidelines and it could result in a less than favorable quality product. If the Food Code requirements for commercially processed foods reheated for hot holding are applied (135°F within two hours), the temperature may not be adequate to eliminate pathogens the food may have been exposed to during

processing at the manufacturer. If the product is considered a ready-to-eat product at retail and is cooked/heated and served immediately, there would be no temperature requirements to apply which could also lead to an unsafe product.

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

That a committee be formed of CFP constituencies and stakeholders in order to make recommendations concerning:

1. how to identify USDA reclassified "not ready-to-eat" foods,
2. the minimum time/temperature controls that should be applied to USDA reclassified "not ready-to-eat" foods to ensure they are safe to consume at retail , and
3. report back the committee's findings the 2020 Biennial Meeting including any recommended changes to the FDA Food Code.

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**Supporting Attachments:**

- "Reclassification of RTE Food"
- "Yuca Rellena Label Spanish"
- "Yuca Rellena Label English"

*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.*