

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.

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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.