

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