

**Conference for Food Protection
2020 Issue Form**

Issue: 2020 III-026

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 3-302.11: When Raw Animal Products Do Not Need Separation from RTE

Issue you would like the Conference to consider:

Modify 3-302.11(A)(2) to indicate ready-to-eat foods may be combined as *ingredients* with raw animal foods.

Public Health Significance:

While 3-302.11(A)(1)(a) clearly states that raw animal products must be kept separate from "raw READY-TO-EAT FOOD such as fruits and vegetables", retailers often package meal kits combining fresh, raw animal products with ready-to-eat food. Whether it is raw turkey in an aluminum pan on top of prepared stuffing, raw chicken with sliced peppers, raw roast wrapped with a bag of peeled vegetables, or a package of ground beef wrapped with tortillas, shredded cabbage, and a lime, the meal kits often contain ready-to-eat products next to raw animal products sometimes with no additional separation.

While the consumer likely sees the need to safely handle and fully cook ready-to-eat foods when combined as ingredients in the same package with raw animal products, the presence of raw animal products next to ready-to-eat foods requiring separate handling or not needing a cook step, may increase the risk of cross contamination for the consumer.

The presence of the fresh meal kits and other combinations of raw animal products with ready-to-eat ingredients at national retailers indicates current practice across multiple jurisdictions. Modifying 3-302.11 to identify that ready-to-eat foods may be combined as an ingredient with raw animal products will alleviate confusion for retail production of raw, fresh animal product meal kits, will help increase nationwide consistency, and will help reduce risk of cross-contamination.

Recommended Solution: The Conference recommends...:

...that a letter be sent to FDA requesting that Section 3-302.11(A)(2) be modified as follows:

(A) FOOD shall be protected from cross contamination by:

...

(2) *Except when combined as ingredients*, separating types of raw animal FOODS ~~from each other~~ such as beef, FISH, lamb, pork, and POULTRY from READY-TO-EAT FOODS and each other during storage, preparation, holding, and display by:

(a) Using separate EQUIPMENT for each type, ^P or

(b) Arranging each type of FOOD in EQUIPMENT so that cross contamination of one type with another is prevented, ^P and

(c) Preparing each type of FOOD at different times or in separate areas; ^P

Submitter Information:

Name: Susan Shelton
Organization: Washington State Department of Health
Address: PO Box 47824
City/State/Zip: Olympia, WA 98504
Telephone: 509-212-1206
E-mail: Susan.Shelton@doh.wa.gov

Supporting Attachments:

- "3-302.11 Raw Meat Meal Kits at Retail"

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.

3-301.11 & Raw Meat Meal Kits at Retail:

Current Examples of Raw Animal Foods Stored with RTE Foods

Photo 1: Chicken Fajita Mix: Raw chicken slices with raw vegetables (Note raw meat handling label)



Photo 2: Taco Meal Kit: Wrapped ground beef next to lime, wrapped cabbage, tortillas, seasonings, etc.



Photo 3: Turkey Dinner: Raw turkey on stuffing next to container of RTE potatoes, green beans, butter, and cranberry sauce.



Photo 4: Roast Meal Kit: Unwrapped beef wrapped with packaged sauce and bagged vegetables

