

Category 1: CFP Recommendations with which CFSAN conceptually agrees

Part 1: 2006 Conference for Food Protection recommendations for changes to 2005 FDA Food Code language

<u>Issue Number</u>	<u>Issue Title</u>
2006-I-002	Food Code Definitions for "Food Establishment" and "Food Processing Plant"
2006-I-003	Person In Charge (PIC) Designation During Non-Production Periods
2006-I-016	Handwashing Sinks-Location & Placement-Public Health Reasons
2006-I-022	Alternate Final Sanitizing Rinse Pressures (mechanical warewashing)
2006-I-027	Modification of Shellstock Maintenance Identification Requirements

CFSAN requested that a CFP representative, Steve Perrine, Toledo/Lucas County (OH) Health Department, be appointed as a member to the ISSC Committee on Traceability to address shellfish tracebacks and review of the existing tagging system.

2006-I-028	Tagging and Labeling of Shellfish
2006-I-032	Time as a Public Health Control /Immediate Consumption
2006-I-033	Cold Holding of Potentially Hazardous Food/TCS Food
2006-I-035	Time as a Public Health Control: Define-"Removed from Temperature Control"
2006-I-036	Allowing Displayed or Held Ready-to-Eat Foods to be Heated for Palatability
2006-II-029*	Inspection Form Ad Hoc Committee Report
2006-II-030	Changes to Inspection Report Form, Marking Instructions and References
2006-II-31*	Amendment to the Marking Instructions for the Inspection Report Form
2006-II-032*	Electronic Inspection Report Form, Data Maintenance and Report Generation
2006-II-033	Development of a Training Program on the Food Inspection Report Form

We conceptually agree that having a training module on the use of the new Inspection Report form would help achieve uniformity in its application. We will pursue development of a training module in a suitable format for ease of widespread use.

2006-II-034*	Inspection Report Form Scoring
--------------	--------------------------------

Category 1: CFP recommendations with which CFSAN conceptually agrees

Part 1 continued: 2006 Conference for Food Protection recommendations for changes to 2005 FDA Food Code language

Issue Number

2006-III-005

Issue Title

Cut Tomatoes as PHF/TCS Food

An informational guide is under development. We anticipate the information will be made available as a Program Information Manual (PIM) document similar to the PIM for Date Marking Cheese.

2006-III-009

2006-III-010

Cheeses Exempt from Date Marking

Storage Temperature of Certain Natural Cheeses

This recommendation asks FDA to “work with stakeholders on scientific issues and product assessments” We have initiated discussions through a meeting with representatives of the National Cheese Institute and FMI to determine next steps for exempting cheese from refrigeration at retail. At this point it is not yet determined if specific Food Code changes can be included in the 2007 Food Code Supplement.

2006-III-013

2006-III-016

Reduced Oxygen Packaging (ROP) Cold Holding Alternative

Change in Sections of Food Code to Better Define Tenderization Risk

We welcome the opportunity to participate on the newly formed Committee for review of the “Guidelines on Blade Tenderized Beef for Restaurants and Retail Food Establishments.” Regarding the recommendation for changing the definition of the term “injected” and adding the term “mechanically tenderized,” whenever possible, it is our intent to use terms in a manner consistent with USDA’s Food Safety and Inspection Service. We will review the proposed language changes and consult with USDA to eliminate any conflict with FSIS usage of the terms.

2006-III-018

New Technology for Ambient Holding/Dispensing of Potentially Hazardous Food (PHF) (Homogeneous Liquids)

At this time the Standard is going through the NSF balloting process. Once that process is complete, we can determine the best modifications to the Food Code to be consistent with the Standard.

Category 1: CFP recommendations with which CFSAN conceptually agrees

Part 2: 2006 Conference for Food Protection recommendations that are related to the FDA Food Code and/or request FDA's involvement in the solution

Issue Number

Issue Title

2006-I-009*

Accepted Inoculation Study Protocols- Time/Temperature Control for Safety (TCS) Food Implementation Committee

CFSAN will be submitting a proposal to the National Advisory Committee for the Microbiological Control of Food (NACMCF) asking for guidance to clarify issues relating to appropriate criteria and protocols which must be considered for inoculation studies. The proposal will be brought forth to the NACMCF Executive Board at its meeting during the last week of August and to the full Committee during its meeting in the fall of 2006.

2006-I-010*

Request for 2006-2008 TCS Food Implementation Committee Implementation of the PHF/TCS

2006-I-013

We support the idea of a 2006-2008 PHF/TCS Committee to work with us on a smooth implementation plan for PHF/TCS with respect to the Food Code definition change. We acknowledge the need for a Q & A document, training, and other instructional documents to assist in understanding of the change.

See Category 2 also.

2006-I-017

Recommended Guidance for the Operation of Mobile Food Units Changing "Critical" and "Non-Critical" Designations for Food Code Provisions

2006-I-029

2006-I-030*

Formation of Committee to work with FDA on the Critical Item Issue Lm Interventions Relating to Equipment Design, Repairs & Construction

2006-III-007

2006-II-018*

Program Standards Committee Report

2006-II-019

Standard No. 3 Clarifying Language

2006-II-020

Standard No. 4 and Appendix D Clarifying Language

2006-II-021

Standard No. 6 Clarifying Language

2006-II-022

Standard No. 6 Appendix F Clarifying Language

2006-II-023

Program Standards, Appendix F addition of "Explanation of the Statistical Model"

2006-II-024

Standard No. 9 Clarifying Language

2006-II-025*

Interdisciplinary Food Borne Illness Training Committee Report

Category 1: CFP recommendations with which CFSAN conceptually agrees

Part 2 continued: 2006 Conference for Food Protection recommendations that are related to the FDA Food Code and/or request FDA's involvement in the solution

<u>Issue Number</u>	<u>Issue Title</u>
2006-II-028*	Interdisciplinary Food Borne Illness Training Committee 2006-08 Charges
2006-II-035*	Certification of Food Safety Regulation Professionals Work Group Report
2006-II-036	Assessment of Training Needs (ATN) for Food Safety Inspection Officers
2006-II-037	FDA Voluntary National Retail Food Regulatory Program Standard No. 2
2006-II-040*	Emergency Preparedness and Response Committee Report
2006-II-041	Posting of Emergency Guidance Document

We will pursue the establishment of a link between the CFP website and the CFSAN website for easy access of the CFP's Emergency Guidance Document via the CFSAN web page.

2006-III-021*	Food Contact Glove Guidance/Usage Document
2006-III-001*	CFP <i>Listeria monocytogenes</i> Intervention Committee Report
2006-III-002*	Date Marking as a Critical Item Committee Report
2006-III-003*	Allergen Committee Report
2006-III-004	Creation of Allergen Committee
2006-III-006	CFP Lm Committee Voluntary Guidelines
2006-III-014	Breaking the Seal When Thawing Frozen Vacuum Packaged Seafood This Issue was extracted by voting delegates for discussion/recommendation within the CFP Executive Board.
2006-III-020*	Creation of Barrier Hazards Committee to work with FDA
2006-III-024*/ **	Creation of Sanitizer Committee to work with FDA, USDA, EPA and other stakeholders

Category 2: CFP recommendations that CFSAN plans to discuss with the CFP Executive Board

Part 2: 2006 Conference for Food Protection recommendations that are related to the FDA Food Code and/or request FDA's involvement in the solution

Issue Number

Issue Title

2006-I-013

Implementation of the PHF/TCS

We do not agree that implementation and enforcement of the new definition should be delayed until the necessary tools are available. Implementation and enforcement can begin with the information provided in the 2005 FDA Food Code and other materials being put on the website but awaiting final approval. Presentations have also been made at national, regional and state meetings to explain the change in definition.

2006-II-038

Recommended Criteria for Standardization/Training Officers

2006-II-039

Education, Credential and Training Criteria for Regulatory Food Safety Professionals

These two Issues speak to a prerequisite Baccalaureate for certain purposes, although each purpose is independently embodied in two different FDA documents. In the 2006-II-038, CFP recommends that the FDA Procedures for the Standardization of Inspection/Training Officers specify that new Standardization/Training Officers possess a Bachelor's Degree with 30 semester or 45 quarter hours in the basic sciences. The recommendation in 2006-II-039 addresses inclusion of the same Bachelor's Degree requirement for new Food Safety Inspection Officers in the Standard No. 2 of the FDA Voluntary National Retail Food Regulatory Program Standards.

We fully appreciate the role that undergraduate and graduate degrees can play in enhancing a person's understanding of food safety principles and application of regulatory requirements. However, it is our position that the recommended changes are beyond the scope and intent of the two FDA documents. We considered many factors and do not intend to establish minimum degree requirements in these documents in which the focus is on the development of inspector competencies. Enrolled jurisdictions continue to have the freedom to maintain, or establish, job requirements in a manner that is fair to all candidates and consistent with applicable personnel, recruitment, and hiring laws.