

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service  
Food and Drug Administration  
College Park, MD 20740-

Ms. Elizabeth A. Nutt, Chair  
c/o Conference for Food Protection  
1302 Silver Spur Circle  
Lincoln, CA 95648

Dear Ms. Nutt:

In accordance with the Conference Procedures, FDA is providing this update on our response to the recommendations of 2006 Conference for Food Protection that relate to the FDA Food Code. This letter serves as an update to the reports FDA provided to CFP Executive Board at the three meeting held since the 2006 Conference.

I am pleased to report that fourteen of sixteen 2006 CFP recommendations that proposed changes to the FDA Food Code were addressed in a Supplement to the 2005 Food Code issued on October 5, 2007. With respect to the exceptions:

- The FDA report to the spring 2007 Executive Board Meeting explained the decision not to address the identification of specific varieties of cheeses that may not require temperature control for safety in the Supplement (Issue 2006-111-010).
- The recommendations in issue 2006-111-016- regarding blade tenderized beef are still being considered by the CFP Blade Tenderization Committee and we expect alternate proposals will be submitted in an Issue to the 2008 Conference meeting.

FDA has also worked with several CFP Committees related to 2006 Conference recommendations and we anticipate submission of Issues for consideration by the 2008 Conference. Among the 2006 Conference Issues that remain under discussion are:

2006-I-009\*            Accepted Inoculation Study Protocols- Time/Temperature Control  
for Safety (TCS) Food Implementation Committee

CFSAN is working with the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) on guidance to clarify issues relating to appropriate criteria and protocols which must be considered for inoculation studies. The group has had two face-to-face meetings and will continue discussions during a meeting in February 2008. The NACMCF was asked for its guidance to clarify six issues. The specific charge provided to NACMCF can be found at [http://www.fsis.usda.gov/About FSIS/NACMCF Subcommittee Inoculated Pack/index.asp](http://www.fsis.usda.gov/About_FSIS/NACMCF_Subcommittee_Inoculated_Pack/index.asp)

2006-I-013                    Implementation of the PHF/TCS  
FDA is working with the CFP Committee on additional guidance on the implementation of the definition of Time/Temperature Control for Safety Foods.

2006-II-041                    Posting of Emergency Guidance Document  
We continue to 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-003/004            Allergen Committee Report and Creation of Allergen Committee  
FDA has a preliminary draft of an allergens guide that is currently undergoing internal Agency review. At this time, it has not been shared with the Committee.

2006-III-009                    Cheeses Exempt From Date Marking  
FDA is still considering how to best clarify the mechanism for identifying which cheeses, if any, should be exempt from the date marking provisions of the Food Code

My staff and I are available to discuss these and other Conference recommendations with the CFP Executive Board and I look forward to continuing in our cooperative relationship with the Conference.

Sincerely yours,

*(original signature)*

Nega Beru, Ph.D.  
Director  
Office of Food Safety  
Center for Food Safety and Applied  
Nutrition

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