Conference for Food Protection 2006-2008 Executive Board Meeting Committee Update – Critical Item Committee Report

Date of Committee Report: March 18, 2007

Submitted By: Dale Yamnik, Committee Chair, and Keith Winkler, Vice Chair

Committee Charge:

Issue 2006-I-029 stated:

The Conference recommends that the FDA continue the charge issued by the 2004 CFP (2004-I-011) to completion and:

- 1. Remove the term "critical item" from the Food Code and replace it with a more appropriate term or terms;
- Redesignate Food Code provisions in terms of their relationship to the risk factors most likely to contribute to foodborne illness and the public health interventions and good retail practices that result in safer food and protect the consumer; and

Work with all stakeholders including a committee created by CFP on draft proposals and submit an issue at the 2008 Conference for Food Protection.

Issue 2006-I-030 stated:

The Conference recommends that a Committee be formed under Council I made up of CFP Stakeholders to provide feedback to the FDA Criticality Work Group regarding:

- Removal of the term "critical item" from the Food Code and replacement with a more appropriate term or terms;
- Provision of clear and defensible definitions for each of the new terms created;
- Development of an objective process, based on sound science and epidemiological data related to the prevention of foodborne illness, that can be used by multiple individuals to come to a consistent, logical conclusion; and
- Re-designation of Food Code provisions regarding their relationship to the risk factors identified by CDC or where
 epidemiological data indicates they are most likely to contribute to foodborne illness.

Committee Membership:

A list of the Committee Membership is attached.

Progress Report/Committee Activities:

To date the Committee has had several conference calls.

- 1. We have briefed the committee members with the historical perspective of the committee.
- 2. We have had a presentation by Greg Able of FDA on GRPs.
- 3. We have practiced using the code evaluation form to determine criticality of a code provision.
- 4. We have evaluated Sections 3-301 through 3-101 through 3-307 of the food code. We found ourselves to be in close alignment. FDA changed their rating on one food code section after discussion with the Committee on our last call.
- 5. We are currently evaluating sections 3-401 through 3-801.
- 6. We have had discussions on the terminology, the evaluation protocol and the spreadsheet used to evaluate the Code sections.
- 7. At this point the definitions/terminology, protocol and form are being used and there seems to be general consensus that this is a good process, although quite time consuming.

Our next call is scheduled for March 28.