



Conference for Food Protection Committee Report March 7, 2011

Committee: Reduced Oxygen Packaging

Date of report: March 7, 2011

From: Brian Nummer, Chair

Committee Charge:

The Conference recommends the formation of a new committee that is charged with the following:

- 1.) create a guidance document detailing the scientific evidence of ROP HACCP controls and preventive measures and provide implementation suggestions.
- 2.) recommend clarifications to the Food Code based on charge one.
- 3.) report back to the Conference in 2012.

Committee members: Attached

Progress Report:

The committee began active phone conferences and email consultations September 2010 just after the August CFP Board meeting and committee member approval. Phone conferences have been held 9/20/10, 9/23/10, 11/15/10, 1/24/11, and 2/28/11.

The first two meetings were organizational. The committee has established a Google documents site located at <https://docs.google.com/leaf?id=0Bx-grmwZp8OaNDE3NGVmMGItODUxYS00NjdkLTk2MTctYWI1M2Q2ZDAzOTdm&hl=en>. It houses copies of all references used by the committee.

The November meeting focused on definitions. A table of definitions and suggested changes is attached. The committee felt that only a few definitions

changes are needed. One main concept unresolved to date is the definition of “extended storage”.

Between the November and January meetings a time/temperature control subcommittee was formed chaired by Don Schaffner. Don reported at the January and February meetings. A summary is attached. Basically, Don has presented Dr. Skinner’s (FDA) extensive data on time to toxin production in *C. botulinum*. The data produced the Skinner Larkin model and a clear demarcation is created for time permitted before toxin production at various storage temperatures. Dr. Skinner joined our call in January to update the committee on his model.

After the February meeting, an internet vote was called to approve the safety of a seven day shelf life at 41°F (temperature only control) for all forms of ROP for potentially hazardous foods (vacuum packaging, cook-chill, and sous vide) based on the Skinner Larkin model and LM data as provided by Don Schaffner. The vote also included that the committee should submit a CFP issue to modify the Food Code section 3-502.12 (Reduced Oxygen Packaging Without a Variance, Criteria) regarding the same. The justification for the time and temperature was A) it is safe according to the Skinner Larkin model and B) it matches the date marking portion of the food code for easier operator and regulator understanding. The internet vote was unanimous in favor.

Requested Board (or other) actions

There are two committee requests and three chair requests.

1-The committee is in need of a USDA representative. Various control measures for ROP (e.g. cooking, cooling, LM lethality’s, CB lethality’s, etc) are established by USDA. A USDA reviewer with knowledge in that area would be helpful to the committee.

2-Karen Reid of Walt Disney World has requested that she be replaced by Dan Goldberg also of Walt Disney. The committee concurs and would like Board approval of the change.

3-The Chair would like to notify the Board that the Retail-foodservice food safety consortium and International Assoc. for Food Protection will be jointly sponsoring a short conference on Reduced Oxygen Packaging at retail. The Conference will be held at the MGM Grand in Las Vegas Sept 20-21, 2011. Details and more formal invitations will come shortly. Please plan to attend. This is directly aimed at retail and foodservice. There will be a separate post meeting ROP HACCP Workshop on Sept 22, 2011.

4-The Chair would like to ask the Board if it is appropriate to provide attendees a CFP Committee update as part of the program (mentioned above). I feel an

update will prompt more discussion amongst a wider audience of food safety professionals and operators. There will be a roundtable portion and participant feedback can assist the CFP ROP committee.

5-The Committee Chair would like to clarify the CFP issue process with regard to suggested changes to the Food Code that may come out of this committee. Based on committee data there may be significant changes recommended to the food code section 3-502 including the potential for total reorganization. Must the committee rewrite the food code or can it make suggestions that FDA rewrite the food code and references to accomplish committee goals?

Recommendation(s) for future charge

The CFP ROP committee is continuing to work on its charge. Some items to be addressed are science-based control measures to eliminate, prevent, or minimize ROP hazards; resolve the "extended storage" definition issue; and discuss clarifications to the variance/ no variance process under this portion of the food code.