

Conference for Food Protection – Committee Periodic Report

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Approved 4/20/2016

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COMMITTEE NAME: **Special Process Controls Committee**

DATE OF REPORT: Initial fall progress report Spring progress report Second fall progress report

Date submitted: 7/7/2017 Date amended (if applicable): 7/13/2017 Date accepted by Executive Board: [Click here to enter a date.](#)

COMMITTEE ASSIGNMENT: Council I Council II Council III Executive Board

REPORT SUBMITTED BY: **Brian Nummer and Rebecca Krzyzanowski**

COMMITTEE CHARGE(S):

Issue # 2016 III-034

The Conference recommends...: a Special Process Controls Committee be formed with the following charges:

1. To review current FDA Food Code specialized processes, including curing and reduced oxygen packaging (ROP) in sections 3-502.11 and 3-502.12 to determine when and if food safety hazards could be controlled by a plan less than a full HACCP plan as defined in 8-201.14.
2. Report back findings and recommendations to the 2018 biennial meeting of the Conference for Food Protection.

COMMITTEE WORK PLAN AND TIMELINE:

1. Have conference calls or email communications Monthly September 2016 - February 2017
 - a. -by March 1, 2017, submit Periodic Report to Council III chairs so that they can submit same to the Executive Board at their Spring meeting
2. Have conference calls or email communications monthly March 2017-June 2017
 - a. -by July 1, 2017, submit Periodic Report to Council III chairs so that they can submit same to the Executive Board at their Fall meeting
 - b. -Subcommittee formed and to meet once or twice a month
 - c. -Templates developed
3. Have conference calls or email communications monthly June 2017-October 2017
 - a. -by Nov 1, 2017, submit FINAL Report to Council III chairs so that they can submit same to the Executive Board
 - b. -if committee approved, submit draft issue for the 2018 conference regarding codifying Special process HACCP templates
 - c. -once reviewed and approved by the committee three Special process HACCP templates will be submitted as an issue for the 2018 biennium conference.

COMMITTEE ACTIVITIES: **Dates of committee meetings or conference calls:**

1. Dates of committee meetings and email committee work
 - a. August 29, 2016
 - b. Sept 12, 2016
 - c. Oct 10, 2016
 - d. Nov 7, 2016 – call canceled, accomplished tasks via email
 - e. Dec 5, 2016
 - f. Jan 9, 2017
 - g. Feb 2017 – call cancelled, accomplished tasks via email voting
 - h. March 6, 2017 – plus email voting
 - i. May 1, 2017
 - j. May 25, 2017 – subcommittee call
 - k. June 5, 2017
 - l. June 23, 2017 – subcommittee call

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- m. July 3, 2017 – no call – accomplished tasks via email July 10, 2017
 - n. Aug 7, 2017 – planned call
2. **Overview of committee activities:** *The committee convened on conference calls and via email. All action items were done by email vote. Committee and Chairs agree that CFP committee update reports are due March 1, 2017 and July 1, 2017. All committee activities will finish in October 2017 and a final report is due November 1, 2017.*
- a. *Based on conference calls and an email vote the majority of committee participants indicated that they generally agree that there should be some form of food safety plan option less than a full 8-201.14 version. The name of that plan was still debatable, but the latest version was –Standardized Special Process Food Safety Plan. Based on conference calls the majority of participants indicated that they generally agree that a Standardized Special Process Food Safety Plan is appropriate when a Special process is “non-complex and deployed in a standardized manner”. Non-complex was further defined as having one CCP or less or when a CFP stakeholder group reviewed a Special Process and determined it to be “non-complex and deployed in a standardized manner”.*
 - b. *(Suggested future charges ») At the present time, the vision is that any Standardized Special Process Food Safety Plan is created and reviewed/approved as a template through a CFP stakeholder process (yet to be determined) and that there will NOT be an option for industry to originate creation on their own as they would a full HACCP plan as defined in 8-201.14. Our Regulatory Consultants have asked the Committee to discuss and clarify the intent of the Standardized Special Process Food Safety Plan within the context of 8-201.14 to determine if and how to codify this issue.*
 - c. *April 2017 – The committee expanded their charge guidelines to (1) Discuss how the Special Process Food Safety Plan could be codified with regard to §8-201.14 of the US FDA model Food Code including suggested issue(s) to be submitted and (2) Discuss how the proposed Standardized Special Process Food Safety Plan templates would be reviewed and approved through a formal CFP stakeholder process (submit as issues to Council)*
 - d. *April- August 2017: The Committee formed a subcommittee to handle item (1) Discuss how the Special Process Food Safety Plan could be codified with regard to §8-201.14 of the US FDA model Food Code including suggested issue(s) to be submitted above and the main committee focused on (2) Discuss how the proposed Standardized Special Process Food Safety Plan templates would be reviewed and approved through a formal CFP stakeholder process. Four conference calls were held and draft Special Process HACCP templates were sent to all committee members with explicit instructions to review and comment back to the committee.*
3. **Charges COMPLETED and the rationale for each specific recommendation:**
- a. The committee voted in February 2017 on three issues (attached to Spring 2017 report). These issues answered the questions in the current committee charge. The vote was a majority “YES” to each of the three committee questions posed.
4. **Status of charges still PENDING and activities yet to be completed:**
- a. None – the charges as approved by Council 3 are complete.
 - b. The committee expanded their charge guidelines to (1) Discuss how the Special Process Food Safety Plan could be codified with regard to §8-201.14 of the US FDA model Food Code including suggested issue(s) to be submitted and (2) Discuss how the proposed Standardized Special Process Food Safety Plan templates would be reviewed and approved through a formal CFP stakeholder process (submit as issues to Council)

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD: **No requested action at this time**

ATTACHMENTS:

1. **Content Documents:**

- a. **Committee Member Roster:** **No changes to previously approved roster -**
- b. **Committee Generated Content Documents (OPTIONAL):** **No draft content documents submitted at this time**

2. **Supporting Attachments (OPTIONAL):** **Not applicable**

- a. Roster