



the
Conference
for FOOD
PROTECTION

TO: National Retail Food Regulatory Association Collaborative

FROM: David McSwane, Executive Director
Conference for Food Protection

DATE: August 31, 2023

SUBJ: Request for Assistance from the Collaborative related to CFP Issues 2023-II-044 and 2023-III-007

Two Issues that were accepted at the 2023 Biennial Meeting of the Conference for Food Protection (CFP) in April 2023 direct the Executive Director of CFP to seek support from the Retail Food Safety Regulatory Association Collaborative.

Issue 2023-II-044 was accepted as amended by Council II and the Assembly of State Delegates of the 2023 Biennial Meeting. This issue recommends that the CFP Food Safety Management System (FSMS) Committee be reestablished as a Standing Committee of the Conference with the following charges:

1. Collaborate with the Retail Food Safety Regulatory Association Collaborative to create resources for establishments to develop a FSMS.
 - a. Toolbox may include instructions on how to create SOPs, draft SOP templates, job aids, case studies, etc. The committee should consider reviewing the "Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles."
 - b. Review the CDC EHS-Net project on employee health and consider collaborating to build on the results to further expand a framework to address employee health SOPs.
2. Review 2021-2023 FSMS Committee - Committee Charges Report and identify specific items to develop remedies.
3. Develop recommendations on next steps to promote universal development and implementation of a documented FSMS to be included in a future edition of the Food Code.
 - a. Conduct a gap analysis of Food Code § 2-103.11 to identify opportunities to incorporate a FSMS into the duties of the person in charge.
4. Collaborate with the Retail Food Safety Regulatory Association Collaborative to conduct a cost/benefit analysis of an implemented FSMS.

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5. Report the committee's findings and recommendations at the next Biennial Meeting of the Conference for Food Protection.

Issue 2023-III-007 pertains to the Review and Streamlining of Retail Sushi HACCP Process. This Issue was accepted as amended by Council III and the Assembly of State Delegates of the 2023 Biennial Meeting. This recommends that two letters be sent, one to the FDA and one to the Retail Food Safety Regulatory Association Collaborative requesting that they jointly identify a panel of experts and create a process to review HACCP Plans for Sushi for chain establishments operating in multiple jurisdictions and provide a validation and approval of the HACCP Plan, and that FDA issue a written interpretation encouraging regulatory authorities to accept the HACCP Plans as approved by the panel, in an effort to standardize HACCP Plan review.

The Conference for Food Protection welcomes any assistance the Collaborative can offer with regard to these two Issues.