Conference for Food Protection 2004-2006
Executive Board Meeting Committee Update -
Date Marking Coded as Critical Violations Committee

Date of Committee Report: July 8, 2005

Submitted By: Dale Yamnik

Committee Charge:

The Conference recommends the conference chairman establish a committee to study the issue of critical items and public health risk and provide its recommendations to the 2006 conference.

Committee Members:

Larry Kohl
Council III Chair
Giant Food Stores, LLC
Carlisle, Pa 17013

Dave Ludwig
Vice Chair Council III
Maricopa County, AZ

Dale Yamnik
542 Eaglestone Drive
Castle Rock, CO 80104

State Regulatory

Mary Fandrey
Jefferson City, MO 65102-0570

Dean Finkenbinder
Lander, WY 82520

Bill Kalabanka
Syracuse, NY 13209

Alaric Mathis
Tallahassee, FL 32399-1710

Gregory Pallaske
Madison, WI 53701-2659

Local Regulatory

Dennis Bauer, R.S., M.S.
Levittown, PA 19055

Roger Coffman
Waukegan, IL 60085

Mo Heydari
Phoenix, AZ 85208

Joyce Theard, MPA, REHS
Clayton, MO 63105

Keith Winkler
Hanford, CA 93230

Federal

Lead Shirley Bohm
College Park, MD 20740-3835

Support Kevin Smith
College Park, MD 20740

Heather Hicks Quesenberry
Washington, DC 20250

Industry

Brenda Bacon
Matthews, NC 28105

Ron Gaither
Cincinnati, OH 45118

Janis McCabe
Lakeland, FL 33802

Kenneth Rosenwinkel
Melrose Park, IL 60160

Casimir Tryba
Springfield, MA 01102-7840

Larry Edwards
Washington, DC 20005

Jason Dickhaut
Dallas, TX 75240

Industry

Kristie Grzywinski
Chicago, IL 60604-2814

John F. Schulz
Washington, DC 20058

Thomas L. Schwarz
Burke, VA 22015

Dale Yamnik
Castle Rock, CO 80104

Consumer

Ken Kelly
Washington, DC 20009

Academia

Richard Linton
West Lafayette, IN 47906

Progress Report/Committee Activity:

Our Committee continues to meet regularly. Since our last report we have met 3 times and are in the process of reviewing a recommended protocol that FDA has provided to help make a more objective determination of whether an item should be critical or not. FDA has recommended a change from the critical/non-critical terminology and has proposed the following terminology to date: Priority, Priority Foundation and Other. An excerpt from the instructions for use of the spreadsheet proposed for determining an items criticality explains which items fit into each of the three categories:

> When determining whether a provision meets the definition for Priority Item, consider whether it has a critical limit associated with it to measure control of the hazard. If yes, it is likely to be a Priority Item. If there is another provision that more directly controls the hazard, it is not likely to be a Priority Item. If the provision supports, facilitates or enables the active managerial control of one or more Priority Items, it is likely to be a Priority Foundation Item. Examples include provisions concerning employees, supervision, necessary equipment, facilities, documentation to execute a priority item, etc.

Items which don't fit into either of these categories would be considered to fall into the 'other' category. Additionally, the swing provision will probably be retained in the code for code sections that have varying degrees of criticality.

An eight step risk assessment has been developed to aid in determining which category a Food Code provision falls into. Additionally, a spreadsheet has been designed to plug in the data and have an organized methodology for collecting and reviewing food code section criticality. A list of instructions is also provided to help individuals utilize the spreadsheet and understand the evaluation process. These three documents are currently being reviewed by the committee and we are using them to evaluate food code sections to determine if this methodology will provide uniform results. FDA is currently using this form to review the entire food code.

At our July 21 meeting we will be discussing our results after utilizing the protocol on selected food code sections. The date marking provision is our current priority item.