

Michael Perez

From: Robert Harrington <rharrin@cnchd.org>
Sent: Tuesday, February 12, 2013 6:53 PM
To: Michael Perez; fs@standards.nsf.org
Subject: RE: [fs] Groups - T Gagliardi e-mail uploaded

Good Afternoon Michael. Please share my comments with the Task Group/Committee:

As you know, my participation record has been spotty, due to the continuing coincidental conflict between Teleconferences and my Board of Health meetings. I regret that will be the situation again tomorrow (2/13), and I will not be able to attend in person.

In the last Teleconference I was able to attend, I recall that we agreed to disagree that it was impossible to completely engineer- out human error, and that the overall purpose of Public Health was not to create a sterile bubble environment, but to employ reasonable measures to reasonably reduce risks. I recall also that there was some degree of consensus that the operating temperatures of Roller Grills provided sufficient protection against microbial contamination (I don't necessarily agree...), and that the major issue was overhead shielding against physical contaminants. That said, here are my thoughts on the Great HotDog Roller Grill Debate:

- * I begin my line of logic with the following quotation from the FDA Model Code (as reprinted/paraphrased in the Wyoming Food Safety Rule, 2009, Chapter 3, Section 57(a):
" *Except for nuts in the shell and whole, raw fruits and vegetables that are intended for hulling, peeling, or washing by the consumer before consumption, food on display shall be protected from contamination by the use of packaging; counter, service line, salad bar food guards, display cases; or other effective means.*"
- * I see no special condition (beyond construction costs...)in a hotdog roller grill that would reasonably exempt it from those protective requirements.
- * Hotdogs are a fully-cooked product that must be re-heated to 165degrees F before hot-holding; Bratwursts, Kielbasas, and other sausages are comminuted and often Raw, and thus must be fully cooked to 165degrees before service.
- * The central purpose of a Roller Grill is temperature *Maintenance*, not cooking or re-thermalizing from a refrigerated or frozen temperature.
- * Absent stringent time-temperature studies, I do not believe that we should assume that a roller grill should be considered
to be an adequate and reliable cooking device.
- * Even if we WERE to conclude that the operating temperatures provided a microbial kill, that does not obviate the potential
for non-microbial contaminants to adulterate the products on display.
- * **CONCLUSION:** A HotDog Roller Grill that places food on display must meet the "...protected from contamination..." requirements noted above

(INCIDENTAL NOTES:

- *We are not fond of self-service Hot Holding Equipment. We believe that, in addition to the questions of microbial or physical contamination, there remains a question of Consumer Safety.
- * We just recently concluded a moderately sized foodborne illness outbreak that originated at a Self-Service Buffet-Style restaurant;
we are, admittedly, more than a little "touchy" about self-service establishments.

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From: fs@standards.nsf.org [mailto:fs@standards.nsf.org] **On Behalf Of** Michael Perez
Sent: Tuesday, February 12, 2013 9:36 AM
To: fs@standards.nsf.org
Subject: [fs] Groups - T Gagliardi e-mail uploaded

Submitter's message

Two new documents have been uploaded to the February 13th folder in our on line workspace.

Item 6 on our teleconference agenda is to revisit the requirements for roller grills in section 5.35.9. Two task group members have expressed concerns regarding this section. The documents uploaded are e-mails from Tony Gagliardi and Randy Lines expressing their concerns.

I am hesitant to send this section to JCFE ballot without unanimous task group support. Therefore, we will reopen the discussion on this section.

Regards, m perez/12 february

-- Michael Perez

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Submitter: Michael Perez

Group: FE Task Group Food Shields

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