

FDA Cheese Tempering Approval Letter



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Public Health Service

Food and Drug Administration
Washington, DC

May 11, 2010

Robert D. Byrne, Ph.D.

Director - Industry & Regulatory Affairs

Schreiber Foods, Inc.

425 Pine Street

Green Bay, WI 54307-9010

Dear Dr. Byrne,

It is my understanding that you are seeking FDA's opinion on whether Schreiber Foods should be advising its foodservice establishment customers that they can safely hold or display *Schreiber Foods Sliced Pasteurized American Cheese* outside of temperature control for periods beyond the limits described in the FDA Food Code. FDA Food Code Section 3-501.19 describes FDA's recommendations for the safe use of time as a public health control (TPHC) when holding or displaying Potentially Hazardous Food or Time/Temperature Controlled for Safety Food (PHF/TCS food) and this remains our recommendation to our regulatory partners that are responsible for the oversight of retail food operations. FDA recognizes that a number of intrinsic and extrinsic factors and the microbial load that may be present in or on any PHF/TCS food will affect the actual time that the food may be safely held at room temperature. The 4- and 6-hour time limits and conditions established in the FDA Food Code are not specific to a particular type of food.

We have reviewed the report completed by Silliker, Inc. on behalf of Schreiber Foods titled *Microbiological Shelf-life and Safety of a Sharp Pasteurized American Cheese Challenged with E. coli O157:H7, Listeria monocytogenes, Staphylococcus aureus and Salmonella spp. at an Abuse Temperature (revised August 18, 2009)*. The study examined the growth profile of various pathogens at temperatures that could be expected in a kitchen environment. The report asserts that the potential for the proliferation of pathogens of concern is minimal when the studied cheese is held outside of refrigeration for up to 96 hours. The study appears to have been conducted in a manner consistent with the recommendations contained in the March 2009 document "*Parameters for Determining Inoculated Pack/Challenge Study Protocols*" as adopted by the National Advisory Committee on Microbiological Criteria for Foods.

It is FDA's opinion that results of this study suggest there is an appropriate scientific basis should a regulated food establishment wish to pursue a variance from the regulatory authority to extend the standard time limits for the use of TPHC for up to 24 hours in an ambient environment not to exceed 88°F when holding or displaying *Schreiber Foods Sliced Pasteurized American Cheese*. This opinion applies only to this specific type of cheese and presumes that the formulation of this cheese is representative of all products bearing the same name. This also presumes that all other conditions described in Food Code Section 3-501.19 are adhered to, including those related to the appropriate product marking and disposition after the allotted time.

As you know, the FDA Food Code is a model regulation and that the operator of a food establishment will be subject to the requirements of the regulatory authority, which is typically a state or local agency. In deciding whether to recognize the use of time alone as a public health control for holding or displaying this PHF/TCS food and whether an extension of the time limits is justified, the regulatory authority may also take into account, among other things, the prevailing regulation or ordinance, the environmental conditions in the food establishment and the ability of the establishment to implement TPHC procedures properly. These factors should also be given consideration when you advise Schreiber customers about the proper handling and storage of your sliced pasteurized process cheese products.

Kind regards,

Kevin Smith

Director, Retail Food and Cooperative Programs Coordination Staff

Center for Food Safety and Applied Nutrition

Food and Drug Administration

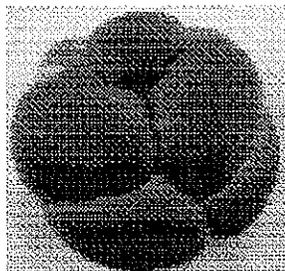
5100 Paint Branch Parkway (HFS-320)

College Park, MD 20740



Implementation Guide

Tempered Cheese / New Premium Bun



National Launch
January / February 2011

IMPLEMENTATION GUIDE TEMPERED CHEESE / PREMIUM BUN CHANGE

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Revision History

| Date | Page # | Modified By | Description of Change |
|----------|--------|--------------|--|
| 12/22/10 | 5,7 | Kurt Gibbons | Added "if requested" to Chicken and Fish fillet cheese application |
| 12/22 | 6 | Kurt Gibbons | Added DSG cheese application clarification |

Overview

Project Objective

Disengagement of 126 ct. Cheese / Cheese Tempering / Cheese Application

- Restaurants will transition out of the 126 ct. cheese and only offer 200 ct. cheese. This soft transition will take place per "Activity Checklist" and must be completed before Premium Fish Media begins.
- Cheese tempering refers to holding 200 ct. cheese at room temperature. Cheese is tempered for 1 hour and then available for use at room temperature for up to 7 additional hours. Restaurants will project the 200 ct. cheese needs for a 7 hour period.
- "Tempering cheese" aids in the overall melt of the cheese on the sandwich.
- **Note: Tempering cheese will begin once 126 ct. cheese has been disengaged.**
- All sandwiches with cheese will be served with tempered cheese.
 - Singles with cheese – two slices of small 200 ct. tempered cheese.
 - Doubles with cheese – two slices of small 200 ct. tempered cheese.
 - Triples with cheese – three slices of small 200 ct. tempered cheese.
 - One slice of cheese will be placed on top of chicken and fish fillets when requested.
- **IMPORTANT: Only 200 ct. cheese will be tempered as Natural cheeses cannot be held in a tempered state.**

IMPLEMENTATION GUIDE TEMPERED CHEESE / PREMIUM BUN CHANGE

Operational Procedures

Health and Safety

- To minimize the possibility of cross contamination and Health hazards, always wash hands before reporting to position and after changing job tasks. Gloves should be discarded and hands washed any time an employee leaves the station.
- To minimize the possibility of contaminating finished products, disposable, vinyl gloves will be worn for handling cheese when tempering.

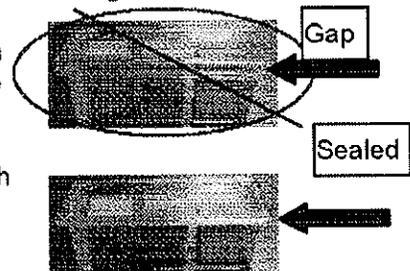
Important
NOTE: Attached in this document you will find a letter from the FDA indicating that it is approved and acceptable for the 200 count sliced cheese to be held at room temperature for a period of up to 8 hours. This procedure is also supported by an independent microbiological challenge study. Even with the supporting documentation, you may still receive inquiries and resistance with this new procedure from your local health department.

Important
If a health department inspector inquires about our new procedure, explain our holding procedures and share the FDA letter with them, in most cases this will suffice. If you have problems with an inspector, where they don't agree with our procedure, comply with their request and return to our standard cold hold procedure to avoid any violations from occurring. Your FAD or DAO should contact QA for further support.

Preparation / Set Up Procedures

Tempered Cheese

- 200-ct. cheese will be "tempered" at room temperature for **1** hour. After "tempering", the cheese can be stored off-line or placed on the sandwich station close to room temperature for a total of **7** hours.
- Place the projected amount of 200 ct. cheese in a 1/3-sized, 4-inch deep plastic pan.
 - The amount placed in the pan is determined by the projected usage in a 7 hour period.
 - Divide each 200 ct. cheese stack so that it fits in the pan with the solid lid sealed on top. (One full stack of cheese is too tall for the lid to seal on the 1/3-sized, 4-inch deep pan)
- Mark a **1** hour tempering time on the side of the 1/3-sized, 4-inch deep plastic pan.
 - This is the time it will take for the cheese to become tempered while being held at room temperature.
- Next to the **1** hour temper time, mark the **7** hour cheese expiration time.
 - This corresponds to the time the cheese can be held at room temperature.
- Place a solid lid on top of the 1/3-sized pan and hold on the back room prep table.
- Cheese must be discarded at the end of the **7** hour hold time.
- Remove the solid lid once the tempered cheese is placed on the sandwich station. (A lid is no longer required for processed cheese held on the service lines.)
- For placement on the service lines, do the following:
 - Place a 1/3-sized, 6-inch deep plastic pan in the cheese pan location on the sandwich station.
 - Place the 1/3-sized, 4-inch deep tempered cheese pan inside a 1/3-sized, 6-inch deep plastic pan; this will allow the cheese to be placed above refrigeration while maximizing storage space on the service line.
- Back-up tempered cheese pans are held on the backroom prep table covered with a solid lid. These pans have the same 8 hour tempering and holding time.



IMPLEMENTATION GUIDE TEMPERED CHEESE / PREMIUM BUN CHANGE

Tempered Cheese (cont.)

- For quality purposes, cheese must be discarded 8 hours after removal from the walk-in cooler.
- **Note:** Temper only what is needed for the rush period.
- Star the cheese before rush periods as a speed of service tip.
 - Star enough 200 ct. cheese for the next hour as corners of the cheese will dry out if over prepped.
- Minimize the amount of cheese tempered for late night.
- **IMPORTANT: CHEESE WILL TAKE 1 HOUR TO COOL DOWN IN THE WALK-IN FROM A TEMPERED STATE. THIS HOUR MUST BE INCLUDED IN THE OVERALL HOLD TIME OF THE CHEESE.**
- At close the 200 ct. cheese, with at least 3 hours remaining on the hold time, is placed in a clean 1/3-sized, 4-inch deep plastic pan.
 - Cover 200 ct. cheese with a solid lid.
 - **Mark the remaining hold time on the pan minus ONE HOUR, corresponding to the cool down time on the side of the pan.**
 - Place a "USE FIRST" sticker on the pan.
 - Place pan in the walk-in.
 - For example:
 - Cheese has 3 hours remaining.
 - Mark 2 hours on the side of the pan. (3 minus 1 hour cool down time at close in the walk-in.)
- The following morning at open, temper previous day's cheese for 1 hour.

New Products

New Premium Bun

THE TRANSITION TO THE NEW PREMIUM BUN WILL BE A SOFT TRANSITION.

Important: clearly mark and separate the current "Random Cut bun" from the New Premium Bun in the bun freezers for frozen bun restaurants or in the back room for fresh bun restaurants to ensure proper rotation and disengagement.

- The New Premium bun will be packaged as per current buns.
- The bag will have a **RED** stripe on the end of the bun bag with red lettering.
- Follow current Prep and Pull charts for thawing.
- Procedures for heating, holding and serving the New Premium Bun do not change from current heating, holding and serving procedures.



Service Procedures

Cheese

Transition to One Size Cheese (200 ct)

- **RESTAURANTS WILL NOT RECEIVE CREDIT FOR UNUSED 126 CT. CHEESE.**
- **IMPORTANT:** Do not begin tempering cheese until all 126 ct. cheese has been depleted.
- 200 ct. cheese will be used for all sandwiches including cheese.
 - Value Hamburgers
 - Premium Hamburgers
 - Chicken Sandwiches (if requested)
 - Fish Sandwiches (if requested)

Tempered Cheese

- All large 4 ounce and small 1.78 ounce beef patties will be served ***HOT*** side up.