

FOOD RISK EVALUATION COMMITTEE TRIP REPORT
2 APRIL 2001
SAN ANTONIO, TEXAS

BACKGROUND

The Food Risk Evaluation Committee (FREC) is established by, and provides service to, the Director, Department of Defense Veterinary Services Activity (DODVSA), and subsequently to the Offices of the Surgeons General. The FREC meets in an annual forum and, as determined necessary by the Chairman through electronic means to:

- a. Provide expert guidance to DODVSA on matters relating to the safety of foods.
- b. Review information sources on the public health risk of food, expertly consider new data, and recommend appropriate actions to protect the health of service personnel.

Membership consists of Army Veterinary Officers in key positions throughout DOD, Chief, Military Public Health, Office of the Air Force Surgeon General, Representative Army Medical Detachment Commanders, Senior Sanitarian, CHPPM and Head, Environmental Health Technical Development Branch, Navy Environmental Health Center. Navy concerns and issues are represented by NEHC and by the Staff Army Veterinarian at NAVSUP, Mechanicsburg, PA.

The committee, again this year, addressed many issues and shared information of vital interest to all uniformed services. Participation in this committee continues to be essential to Force Protection of Sailors and Marines. I recommend continued high priority attention to the work of this committee.

COMMITTEE MEETING

The FREC convened at 0800, 2 April 2001. Colonel Lafon C. Lively, Director of Food Safety and Public Health, U. S. Army Veterinary Command and Chairman of the FREC delivered opening remarks and welcomed the participants. Mr. Robert Kilburn, FREC Coordinator set the agenda and reviewed the documentation packages. There was no old business. The major issue discussions are detailed below.

Update on Juices. Mr. Kilburn provided an update on the new Food and Drug Administration juice regulations. These regulations will be implemented incrementally for juice processors between January 2002 and January 2004 depending on business size and revenues. The new regulations adopt an exemption for shelf stable juices and will ultimately require HACCP plans for all juice processors.

Update on Approved Source Requirements, AR 40-657. CW5 Killian reported that the revisions to the approved source regulations are nearing completion. He reported the summary of changes as follows:

- **Required to be approved.**
 - Commercial Ice plants and bottled water plants must be inspected and approved by the Army Veterinarians.
 - Off-post caterers and civilian restaurants that supply on base dinner theaters and unit parties.
 - Mobile canteens and snack trucks under government contract. These are an extension of the central kitchen. Both must be inspected.
 - Subcontractors who provide ingredients that constitute health hazards if there is no control by the Prime Contractor to detect hazards.
 - USDA approved cold storage warehouses storing military owned foods.
 - Foreign establishments – when procuring directly from these plants, without further distribution or broker.

- **Exempt from approval.**
 - Military Entrance Stations (MEPS).
 - Overseas Kantines, Mensas.
 - Emergency purchases by the Navy afloat.
 - Privately prepared foods (direct sale; donations; social gatherings)
 - Subcontractors who provide ingredients with no health hazard, who are under other regulatory sanitary programs, or whose Prime Contractor tests or requires testing for hazards.
 - Plants listed in other regulatory directories.
 - Foreign establishments whose pre-packed, finished product is imported by distributors or brokers into the United States, sold for commissary resale or Non-appropriated fund use.**

***** Discussion followed regarding exemption of overseas plants covered by other regulators. The FREC proposed completion of a study to determine the level experienced with such products before going forward with the exemption.***

Mr. Kilburn reported that field activities request approval exemption for low-moisture cheeses (e.g., Parmesan, Romano) that are considered shelf stable. The FREC agreed that further data is needed. Veterinary Command will collect the data and a follow-up FREC voice conference will be conducted.

GAO Seafood Safety Report. Mr. Kilburn discussed the January 2001 GAO Report to the Committee on Agriculture, Nutrition, and Forestry, U. S. Senate entitled, **Federal Oversight of Seafood Does Not Sufficiently Protect Consumers.** The detailed report includes discussion of Seafood related illnesses, import nation safety programs, HACCP, and inspections. The report also includes rebuttal comments from the Food and Drug Administration. GAO concluded that while progress has been made in ensuring the safety of seafood, the FDA is ineffective in the implementation of HACCP and that limited resources preclude effective inspection programs. They also stated that a lack of equivalency programs with other nations contributed to the import of unsafe seafood. GAO suggests that all domestic fishing vessels and processing firms should have HACCP plans. In the FDA rebuttal, they challenged the perceived inference in the GAO report that Seafood is inherently riskier than other commercial sources of animal protein. The FDA indicates that GAO misapplied the outbreak data obtained from CDC in comparing it with other nonspecific food borne illness. The FDA further disagreed with the need for HACCP plans on all vessels. They indicate that HACCP decisions are based on the level of processing activities performed. I have the full GAO report available for review.

Food Contact Sanitizers. Mr. Robinson provided an update of the activities of the Shipboard Hazardous Materials List (SHML) Working Group. He discussed the revision recently submitted to DLA of the Commercial Item Description (CID) for Sanitizer-Detergent, General Purpose (Quaternary Ammonium Compound) A-A-1442. This CID, which defines the commercial requirements for food contact surface sanitizers, was last updated 22 May 1981. The most significant change to the CID is the addition of the verbiage: **“In order to be safely used on food processing equipment and utensils, and on other food contact articles, the product must comply with the specifications and conditions described in Food and Drug Administration, Department of Health and Human Services Regulations for *Indirect Food Additives: Adjuvants, Production Aids, and Sanitizers-Table Subpart B-Substances Utilized To Control the Growth of Microorganisms – Sanitizing Solutions.* (21CFR178.1010) Revised April 1, 2000.”**

Soy Products. Colonel Pixley provided a report on soy products from a nutritional and a food protection perspective. He reported that while soy products are widely prescribed as effective substitutes for meats, cheeses, and milk, there are nutritional factors to consider. Soybeans contain large quantities of potentially harmful substances. Firstly, they contain powerful enzyme inhibitors that block the action of trypsin and other enzymes vital to protein digestion. These antinutrient substances are not completely deactivated during cooking and can produce serious gastric distress, reduced protein digestion and deficiencies in amino acid uptake. The soybean also contains hemagglutinin, a clot promoter. While trypsin inhibitors and hemagglutinin are deactivated in fermentation, they still concentrate in the soaking liquid of precipitated products like tofu and bean curd. Consequently, the substances are reduced, but not eliminated in such

products. Soybeans are also high in phytic acid or phytates, an organic acid present in the bran or hulls of all seeds, but highest in the soybean. Phytates block the uptake of calcium, magnesium, iron, and zinc. Like the enzyme inhibitors and hemagglutinin, phytate content is only significantly reduced by long and full fermentation, such as in products like tempeh and miso. Soymilks, protein isolates, and textured vegetable protein will contain significant levels of these nutritional impacters. Colonel Pixley and Mr. Kilburn presented additional information on the handling and protection of soymilk. Soymilk is processed the same way as dairy milk. It is available in shelf stable varieties that are processed through STHT sterilization. Refrigerated soymilk is pasteurized and has the same processing and handling concerns associated with dairy milk.

Cook/Chill. Major Tim Stevenson provided an excellent update on the status of cook chill operations, including a revisit to the Okinawa operation discussed last year. The army is operating a facility at West Point and a new operation is nearing completion in Great Lakes. Major Stevenson addressed the scope of the operations and the potential pitfalls and hazards we may face as they become more prevalent. He highlighted the inadequacy of the USDA requirements for time and temperature, particularly when contrasted with the science-based standards being employed in the United Kingdom and the European Union.

OBSERVATIONS

Once again, I was honored to represent our interests and to connect with this impressive body of professionals. This is highly scientific-based decision-making body. Each issue is looked at from available data and decisions are made in a clear, open and risk based manner.

Thanks for the opportunity.

V/r

Charles