### APPENDIX 4: Bacterial Pathogen Growth and Inactivation

This guidance represents the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the telephone number listed on the title page of this guidance.

This appendix contains information on the growth and inactivation of bacterial pathogens.

**Table A-1** contains information on the minimum water activity  $(a_w)$ , acidity (pH), and temperature; the maximum, pH, water phase salt, and temperature; and oxygen requirements that will sustain growth for the bacterial pathogens that are of greatest concern in seafood processing. Data shown are the minimum or maximum values, the extreme limits reported among the references cited. These values may not apply to your processing conditions.

**Table A-2** contains information on maximum, cumulative time and internal temperature combinations for exposure of fish and fishery products that, under ordinary circumstances, will be safe for the bacterial pathogens that are of greatest concern in seafood processing. These maximum, cumulative exposure times are derived from published scientific information.

Because the nature of bacterial growth is logarithmic, linear interpolation using the time and temperature guidance may not be appropriate. Furthermore, the food matrix effects bacterial growth (e.g., presence of competing microorganisms, available nutrients, growth restrictive agents). Consideration of such attributes is needed when using the information in Tables A-1 and A-2.

#### In summary, Table A-2 indicates that:

For raw, ready-to-eat products:

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• If at any time the product is held at internal temperatures above 70°F (21.1°C), exposure time (i.e., time at internal temperatures

above 50°F (10°C) but below 135°F (57.2°C)) should be limited to 2 hours (3 hours if *Staphylococcus aureus* (*S. aureus*) is the only pathogen of concern),

OR

Alternatively, exposure time (i.e., time at internal temperatures above 50°F (10°C) but below 135°F (57.2°C)) should be limited to 4 hours, as long as no more than 2 of those hours are between 70°F (21.1°C) and 135°F (57.2°C);

OR

• If at any time the product is held at internal temperatures above 50°F (10°C) but never above 70°F (21.1°C), exposure time at internal temperatures above 50°F (10°C) should be limited to 5 hours (12 hours if *S. aureus* is the only pathogen of concern);

### OR

• The product is held at internal temperatures below 50°F (10°C) throughout processing,

OR

Alternatively, the product is held at ambient air temperatures below 50°F (10°C) throughout processing.

For cooked, ready-to-eat products:

• If at any time the product is held at internal temperatures above 80°F (26.7°C), exposure time (i.e., time at internal temperatures above 50°F (10°C) but below 135°F (57.2°C)) should be limited to 1 hour (3 hours if *S. aureus* is the only pathogen of concern),

OR

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Alternatively, if at any time the product is held at internal temperatures above 80°F (26.7°C), exposure time (i.e., time at internal temperatures above 50°F (10°C) but below 135°F (57.2°C)) should be limited to 4 hours, as long as no more than 1 of those hours is above 70°F (21.1°C);

### OR

• If at any time the product is held at internal temperatures above 70°F (21.1°C) but never above 80°F (26.7°C), exposure time at internal temperatures above 50°F (10°C) should be limited to 2 hours (3 hours if *S. aureus* is the only pathogen of concern),

### OR

Alternatively, if the product is never held at internal temperatures above 80°F (26.7°C), exposure times at internal temperatures above 50°F (10°C) should be limited to 4 hours, as long as no more than 2 of those hours are above 70°F (21.1°C);

### OR

• If at any time the product is held at internal temperatures above 50°F (10°C) but never above 70°F (21.1°C), exposure time at internal temperatures above 50°F (10°C) should be limited to 5 hours (12 hours if *S. aureus* is the only pathogen of concern);

### OR

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• The product is held at internal temperatures below 50°F (10°C) throughout processing,

### OR

Alternatively, the product is held at ambient air temperatures below 50°F (10°C) throughout processing.

Note that the preceding recommended critical limits do not address internal product temperatures between 40°F (4.4°C), the recommended maximum storage temperature for refrigerated fish and fishery products, and 50°F (10°C). That is because growth of foodborne pathogenic bacteria is very slow at these temperatures and the time necessary for significant growth is longer than would be reasonably likely to occur in most fish and fishery product processing steps. However, if you have processing steps that occur at these temperatures that approach the maximum cumulative exposure times listed in Table A-2 below for the pathogenic bacteria of concern in your product, you should consider development of a critical limit for control at these temperatures.

It is not possible to furnish recommendations for each pathogenic bacteria, process, type of fish and fishery product, and temperature or combination of temperatures. Programmable models to predict growth rates for certain pathogens associated with various foods under differing conditions have been developed by the U.S. Department of Agriculture's (Pathogen Modeling Program (PMP)) and the United Kingdom's (Food MicroModel (FMM) program). These programs can provide growth curves for selected pathogens. You indicate the conditions, such as pH, temperature, and salt concentration that you are interested in and the models provide pathogen growth predictions (e.g., growth curve, time of doubling, time of lag phase, and generation time). FDA does not endorse or require the use of such modeling programs, but recognizes that the predictive growth information they provide may be of assistance to some processors. However, you are cautioned that significant deviations between actual microbiological data in specific products and the predictions do occur, including those for the lag phase of growth. Therefore, you should validate the time and temperature limits derived from such predictive models.

**Table A-3** contains information on the destruction of *Listeria monocytogenes* (*L. monocytogenes*). Lethal rate, as used in this table, is the relative lethality of 1 minute at the designated internal product temperature as compared with the lethality of 1 minute at the reference internal product temperature of 158°F (70°C) (i.e.,  $z = 13.5^{\circ}F$  (7.5°C)). For example, 1

minute at 145°F (63°C) is 0.117 times as lethal as 1 minute at 158°F (70°C). The times provided are the length of time at the designated internal product temperature necessary to deliver a 6D process for L. monocytogenes. The length of time at a particular internal product temperature needed to accomplish a six logarithm reduction in the number of *L. monocytogenes* (6D) is, in part, dependent upon the food in which it is being heated. The values in the table are generally conservative and apply to all foods. You may be able to establish a shorter process time for your food by conducting scientific thermal death time studies. Additionally, lower degrees of destruction may be acceptable in your food if supported by a scientific study of the normal initial levels in the food. It is also possible that higher levels of destruction may be necessary in some foods, if especially high initial levels are anticipated.

Table A-4 contains information on the destruction of Clostridium botulinum (C. botulinum) type B (the most heat- resistant form of non-proteolytic C. botulinum). Lethal rate, as used in this table, is the relative lethality of 1 minute at the designated internal product temperature as compared with the lethality of 1 minute at the reference product internal temperature of 194°F (90°C) (i.e., for temperatures less than 194°F (90°C), z = 12.6°F (7.0°C); for temperatures above 194°F (90°C),  $z = 18^{\circ}F(10^{\circ}C)$ ). The times provided are the length of time at the designated internal product temperature necessary to deliver a 6D process for C. botulinum. The values in the table are generally conservative. However, these values may not be sufficient for the destruction of nonproteolytic C. botulinum in dungeness crabmeat because of the potential protective effect of lysozyme. You may be able to establish a shorter process time for your food by conducting scientific thermal death time studies. Additionally, lower degrees of destruction may be acceptable in your food if supported by a scientific study of the normal innoculum in the food.

			CONDITIONS FOR	LIMITING CONDITIONS FOR PATHOGEN GROWTH	Ξ		
PATHOGEN	MIN. A <sub>w</sub> (USING SALT)	MIN. pH	MAX. PH	MAX. % WATER PHASE SALT	MIN. TEMP.	MAX. TEMP.	OXYGEN REQUIREMENT
BACILLUS CEREUS	0.92	4.3	9.3	10	39.2°F 4°C	131°F¹ 55°C	facultative anaerobe <sup>4</sup>
CAMPYLOBACTER JEJUNI	0.987	4.9	9.5	1.7	86°F 30°C	113°F 45°C	micro- aerophile <sup>2</sup>
CLOSTRIDIUM BOTULINUM, TYPE A, AND PROTEOLYTIC TYPES B AND F	0.935	4.6	6	10	50°F 10°C	118.4°F 48°C	anaerobe <sup>3</sup>
CLOSTRIDIUM BOTULINUM, TYPE E, AND NON- PROTEOLYTIC TYPES B AND F	0.97	v	6	Ś	37.9°F 3.3°C	113°F 45°C	anaerobe <sup>3</sup>
CLOSTRIDIUM PERFRINGENS	0.93	ý	6	~	50°F 10°C	125.6°F 52°C	anaerobe <sup>3</sup>
Pathogenic Strains of Escherichia coli	0.95	4	10	6.5	43.7°F 6.5°C	120.9°F 49.4°C	facultative anaerobe <sup>4</sup>
LISTERIA MONOCYTOGENES	0.92	4.4	9.4	10	31.3°F -0.4°C	113°F 45°C	facultative anaerobe <sup>4</sup>
SALMONELLA SPP.	0.94	3.7	9.5	œ	41.4°F 5.2°C	115.2°F 46.2°C	facultative anaerobe <sup>4</sup>
SHIGELLA SPP.	0.96	4.8	9.3	5.2	43°F 6.1°C	116.8°F 47.1°C	facultative anaerobe <sup>4</sup>
STAPHYLOCOCCUS AUREUS GROWTH	0.83	4	10	20	44.6°F 7°C	122°F 50°C	facultative anaerobe <sup>4</sup>
STAPHYLOCOCCUS AUREUS TOXIN FORMATION	0.85	4	9.8	10	50°F 10°C	118°F 48°C	facultative anaerobe <sup>4</sup>
VIBRIO CHOLERAE	0.97	Ś	10	9	50°F 10°C	109.4°F 43°C	facultative anaerobe <sup>4</sup>
VIBRIO PARAHAEMOLYTICUS	0.94	4.8	11	10	41°F 5°C	113.5°F 45.3°C	facultative anaerobe <sup>4</sup>
VIBRIO VULNIFICUS	0.96	Ś	10	Ś	46.4°F 8°C	109.4°F 43°C	facultative anaerobe <sup>4</sup>
YERSINIA ENTEROCOLITICA	0.945	4.2	10	7	29.7∘F -1.3°C	107.6°F 42°C	facultative anaerobe <sup>4</sup>
<ol> <li>Has significantly delayed growth (&gt;24 hours) at 131°F (55°C).</li> <li>Requires limited levels of oxygen.</li> <li>Requires the absence of oxygen.</li> <li>Grows either with or without oxygen.</li> </ol>	wth (>24 hours) at 131°F Ien. an. xygen.	(55°C).					

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TABLE A-2				
TIME AND TEMPERATURE GUIDANCE FOR				
CONTROLLING PATHOGEN GROWTH AND TOXIN FORMATION IN FISH AND FISHERY PRODUCTS				
POTENTIALLY HAZARDOUS CONDITION	PRODUCT TEMPERATURE	MAXIMUM CUMULATIVE EXPOSURE TIME		
GROWTH AND TOXIN FORMATION	39.2-43°F (4-6°C)	5 days		
BY <b>BACILLUS CEREUS</b>	44-59°F (7-15°C)	1 day		
	60-70°F (16-21°C)	6 hours 3 hours		
GROWTH OF <b>CAMPYLOBACTER JEJUNI</b>	Above 70°F (21°C) 86-93°F (30-34°C)			
GROWTH OF CAMPTLOBACTER JEJUNI	Above 93°F (30-34°C)	48 hours 12 hours		
GERMINATION, GROWTH, AND TOXIN	50-70°F (10-21°C)	11 hours		
Formation by <b><i>clostridium Botulinum</i></b> Type A, and proteolytic types B and F	Above 70°F (21°C)	2 hours		
GERMINATION, GROWTH, AND TOXIN	37.9-41°F (3.3-5°C)	7 days		
FORMATION BY CLOSTRIDIUM BOTULINUM	42-50°F (6-10°C)	2 days		
TYPE E, AND NON-PROTEOLYTIC TYPES B AND F	51-70°F (11-21°C)	11 hours		
	Above 70°F (21°C)	6 hours		
GROWTH OF CLOSTRIDIUM PERFRINGENS	50-54°F (10-12°C)	21 days		
	55-57°F (13-14 °C)	1 day		
	58-70°F (15-21°C) Above 70°F (21°C)	6 hours <sup>1</sup> 2 hours		
GROWTH OF PATHOGENIC STRAINS OF	43.7-50°F (6.6-10°C)	2 days		
ESCHERICHIA COLI	51-70°F (11-21°C) Above 70°F (21°C)	5 hours 2 hours		
GROWTH OF LISTERIA MONOCYTOGENES	31.3-41°F (-0.4-5°C)	7 days		
	42-50°F (6-10°C) 51-70°F (11-21°C)	1 day 7 hours		
	71-86°F (22-30°C)	3 hours		
	Above 86°F (30°C)	1 hour		
GROWTH OF <b>SALMONELLA</b> SPECIES	41.4-50°F (5.2-10°C)	2 days		
	51-70°F (11-21°C)	5 hours		
	Above 70°F (21°C)	2 hours		
GROWTH OF <b>SHIGELLA</b> SPECIES	43-50°F (6.1-10°C)	2 days		
	51-70°F (11-21°C)	5 hours 2 hours		
	Above 70°F (21°C) 50°F (7-10°C)			
GROWTH AND TOXIN FORMATION BY STAPHYLOCOCCUS AUREUS	50°F (7-10°C) 51-70°F (11-21°C)	14  days $12 \text{ hours}^1$		
	Above 70°F (21°C)	3 hours		
GROWTH OF <b>VIBRIO CHOLERAE</b>	50°F (10°C)	21 days		
	51-70°F (11-21°C)	6 hours		
	71-80°F (22-27°C)	2 hours		
	Above 80°F (27°C)	1 hour <sup>2</sup>		
GROWTH OF VIBRIO PARAHAEMOLYTICUS	41-50°F (5-10°C)	21 days		
	51-70°F (11-21°C)	6 hours		
	71-80°F (22-27°C)	2 hours		
	Above 80°F (27°C)	1 hour <sup>2</sup>		
GROWTH OF VIBRIO VULNIFICUS	46.4-50°F (8-10°C)	21 days		
	51-70°F (11-21°C)	6 hours		
	71-80°F (22-27°C) Above 80°F (27°C)	2 hours 1 hour <sup>2</sup>		
growth of <b>Yersinia Enterocolitica</b>	29.7-50°F (-1.3-10°C)	1 day		
	51-70°F (11-21°C) Above 70°F (21°C)	6 hours 2.5 hours		
	ADOVE /0 F (21 C)	2.9 110018		
1. Additional data needed.				
2. Applies to cooked, ready-to-eat foods only.				

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