

**Conference for Food Protection  
2010 Issue Form**

**Internal Number: 071  
Issue: 2010 III-016**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

*All information above the line is for conference use only.*

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**Title:**

Sequential Application of Hand Antiseptic for Use in No-Water Situations

**Issue you would like the Conference to consider:**

Effective hand hygiene for situations where soap and water are unavailable remains a challenge for food safety. Under the 2009 FDA Model Food Code, Section 2-301.16, employees may use a hand antiseptic to clean hands when food exposure is limited and handwashing sinks are not conveniently available. In addition, employees may use chemically treated disinfectant towelettes per Section 5-203.11(C).

It has now been found that an effective hand cleansing, equivalent to handwashing with soap and water as specified in Section 5-203.11, can be achieved by sequential use of alcohol-based hand antiseptics, wherein a first application is wiped off with a dry single-use towel, followed immediately by a second application that is allowed to dry as per normal use directions. The latest testing of this hand cleansing/degerming technique shows it to be effective in the presence of organic food soils. This adds an additional safety factor to support incorporation of the method into food safety practices for select situations.

This protocol is not a substitute for handwashing in stationary facilities where cleaning can be accomplished per 2-301.12.

[Note: After the near unanimous vote for adoption by Council III in 2008, this issue was extracted during the Assembly of Delegates, citing the need for additional testing which has now been concluded along with an additional two years of field testing under the guidance of the Southern Nevada Health District. SNHD has also cleared this intervention for school foodservice use during water outages.]

**Public Health Significance:**

Potential contamination of ready-to-eat foods is increased in situations where access to soap and water are limited or simply unavailable. The new proposed option increases the odds of effective hand degerming in those situations, including its use between single-use glove changes.

**Recommended Solution: The Conference recommends...:**

a letter be sent to FDA requesting the following change to the Model Food Code:

5-203.11 Handwashing Sinks

(A)(B)(C)

(D) When food exposure is limited and handwashing sinks are not conveniently located, such as at outdoor events, mobile or temporary food service and some vending machine locations, employees may use a regimen of sequential application of hand antiseptic wherein the first application is treated as a handwash with full scrubbing action for 15 seconds and then, while wet, wiped off with a single-use paper towel, immediately followed by a second application which is allowed to dry per standard label instruction.

(i) Said hand antiseptic shall meet requirements of 2-301.16

(ii) Said hand antiseptic shall have supporting test data indicating statistical equivalence to a standard handwash in hand degerming.

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**Attachments:**

- "Determination of the Antimicrobial Efficacy of Three Test Articles (2008)"
- "Determination of the Antimicrobial Efficacy of Three Test Articles (2009)"
- "Sequential Application of Hand Antiseptic for Use in No-Water Situations"
- "SaniTwice: A Hand Hygiene Solution for Food Handlers"
- "Test Results For Heavy Soil Pilot SaniTwice Study"

*It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.*