

**Conference for Food Protection
2010 Issue Form**

**Internal Number: 067
Issue: 2010 III-017**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

All information above the line is for conference use only.

Title:

Elimination of Open, Refillable Soap Dispensers

Issue you would like the Conference to consider:

The Food Code emphasizes the critical role of hygiene in prevention of foodborne illness. Numerous sections of the 2009 Food Code address specifications and requirements for water quality, air supply, surface and utility cleanliness, and cleaning materials. Similarly, various Code Sections, including 2-102.11(C)(8), 2-301.11-16, 5-202.12, 5-203.11, 5-204.11 and 5-205.11, delineate sink and faucet parameters, handwashing procedures, and other aspects for proper handwashing in food handling operations. However, the Code lacks specification for the types of soap dispensing systems suitable for handwashing products in food handling settings. This important gap creates the potential for increased microbiological contamination due to the use of open, refillable reservoir-type dispensing systems. It has been known for decades that contaminated soap can lead to disease transfer. Following a number of infectious disease outbreaks, the use of open, refillable soap systems in Healthcare facilities was essentially eliminated in the 1990's and codified in the 2002 CDC/HICPAC Guidelines for Hand Hygiene in Health-Care Settings. Very recent guidance from Health Canada (issued December 2009) requires professional food handler antiseptic products to be labeled "Do not refill container", essentially banning bulk dispensing systems for food environments in Canada.

Recent research by the University of Arizona demonstrates that high level bacterial contamination of open, refillable soap dispensing systems is widespread, including retail Foodservice settings. Additional studies at the University of Montana show that on-going recontamination of fresh soap in refillable dispensers is due to biofilm formation and nearly impossible to eliminate despite aggressive cleaning procedures. Further, these studies show that biofilm contamination of open, refillable dispensers occurs regardless of design or materials of construction. Even more recent studies by GOJO Industries demonstrate that soap contamination transfers from the dispensed soap to the hands during washing and subsequently to surfaces (fomites).

Solutions to this contamination problem are readily available. A plethora of sealed, non refillable dispensing systems are virtually universally available. While some of these systems are proprietary, many are essentially commodity products in the same way that open systems are today, providing a facility with a broad choice of products and suppliers.

Public Health Significance:

High level contamination (approaching pure bacterial cultures) of open, refillable and non hygienic soap dispensers with coliforms and other pathogenic organisms represents an unnecessary risk of infection to foodservice workers and patrons.

Recommended Solution: The Conference recommends...:

a letter be sent to FDA requesting the following change to the Model Food Code:
5-202.11

(C) A dispensing system for hand soap and/or hand antiseptic shall be of a sealed-refill design and not have a product reservoir susceptible to refilling from a secondary container, "topping off", or dilution with water or other materials. If used, individual bottles of hand soap or hand disinfectant shall be disposed of after use of the initial contents and not refilled.

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Attachments:

- "Bacterial Contamination of Soap from Open, Refillable Bulk Dispensers"
- "Evaluation of Contaminated Bulk Soap Dispensers for Biofilm Bacteria"
- "Handwashing with Contaminated Soap Results in Hand Contamination"
- "Opportunistic Pathogens From Contaminated Bulk Soap on the Hands"
- "Open Refillable Bulk Soap Dispensers in Public Restrooms"
- "Guidance Document: Human-Use Antiseptic Drugs"

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.