

**Conference for Food Protection
2010 Issue Form**

**Internal Number: 035
Issue: 2010 III-022**

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

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Title:

Antimicrobial Treatments for Washing Fruits & Vegetables

Issue you would like the Conference to consider:

Approved antimicrobial treatments for washing fruits and vegetables can be useful to reduce the risk of cross contamination, particularly for produce that will be served without cooking. Language in Annex 3 §3-302.15 Washing Fruits and Vegetables may cause confusion regarding when antimicrobial treatments can be used for washing fruits and vegetables in retail and food service establishments, and do not clearly convey the potential benefit of these treatments. Additionally, some antimicrobial treatments that are approved for washing fruits and vegetables contain surfactants and statements in Annex 3 §3-302.15 could be misinterpreted to exclude these as acceptable solutions.

Public Health Significance:

Antimicrobial treatments used for washing fruits and vegetables must be used at the correct concentration to assure that no harmful residues are transferred to foods. When used at appropriate concentrations, antimicrobial treatments can reduce the risk of cross contamination through wash water. Recent, peer reviewed research (e.g. Zhang et. al 2009) demonstrates the potential benefit of using several antimicrobials to reduce transfer of a pathogen from contaminated produce to uncontaminated produce, as compared to using water alone.

FDA Guidance to the Industry (February 2008), which is included as a reference in Annex 3, includes the following statement, which clearly recognizes that sometimes temperature differentials may not be practical and alternative methods to reduce risk do exist.

"When it is not practical to reduce the temperature differential between the wash/cooling water and the produce, it is especially important that processors follow practices to minimize pathogens in the water or on the surface of produce. Such practices may include using antimicrobial chemicals in the wash water or using spray type wash treatments instead of submerging produce."

Providing practical alternative approaches for washing produce is important to protect public health at the retail level as well.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA recommending the following changes to the Food Code:

Annex 3 §3-302.15 Washing Fruits and Vegetables.

"... All fresh produce, except commercially washed, pre-cut, and bagged produce, must be thoroughly washed using under-running, potable water, with or without antimicrobial treatments, before eating, cutting or cooking. ..."

"... To reduce the likelihood of infiltration, wash water temperature should be maintained at 10°F warmer than the pulp temperature of any produce being washed. Because certain fruits and vegetables are susceptible to infiltration of microorganisms during soaking or submersion, it is recommended that soaking or submerging produce during cleaning be avoided. When it is not practical to reduce the temperature differential between the wash/cooling water and the produce, it is especially important to follow practices to minimize pathogens in the water or on the surface of produce. Such practices may include using antimicrobial chemicals in the wash water or using spray type wash treatments. It is important that proper handwashing procedures are followed, in accordance with ~~¶~~ Section 2-301.12 (F) Cleaning Procedure, before and after handling fresh produce."

"... Washing fresh fruits and vegetables with unapproved soap, detergent or other surfactants that do not have antimicrobial properties should be avoided as they facilitate infiltration ~~and may not be approved for use on food.~~ ... "

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Attachments:

- "Zhang, et al. 2009 antimicrobial transfer reference"
- "FDA 2008 Guidance to Industry on fresh cut Fruits and Vegetables."

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.