**Conference for Food Protection**

**2012 Issue Form**

**Internal Number: 099**

**Issue: 2012 I-029**

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| **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:**

Testing for Hot Water Sanitizing

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

The 2009 FDA Food Code addresses the failure of having test kits for chemical sanitizing (automatic dish machine) as a priority. However, nowhere in the food code does it require the same of hot water sanitization test kits. In fact the Code is silent on this issue (no specificity relating to hot water test kits). Unless a method of ascertaining the level of hot water sanitization occurring in the machine is identified (e.g., the surface of the utensil has met 160°F requirement), validating the machine's operational criteria cannot be objectively measured.

Validating whether the surface temperature has met the required 160°F requirement provides assurance that the utensil has been properly cleaned which includes sanitization. Failure to validate can have negative consequences as failure to validate a temperature of a potentially hazardous food item.

**Public Health Significance:**

Validation that efficacious sanitization is occurring is an important part of the overall cleaning procedure, whether through manual cleaning (3-compartment sink) or automatic (ware washing machines) cleaning. In automatic operations, heat treatment occurs when the final rinse spray is higher than the upper limit specified by the manufacturer's instructions.

It is commonly understood that if utensils are not cleaned properly, microorganisms are potentially transmitted via foods to other foods by utensils. Therefore, validating that cleaning and sanitization has occurred is an important component in the reduction of disease transmission via food.

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

that a letter be sent to FDA requesting that the 2009 Food Code (as modified by the Supplement issued in 2011), Section 4-703.11(B), be amended as follows (new language shown with underline and deleted language shown with strike-through):

Hot water mechanical operations by being cycled through EQUIPMENT that is set up as specified under §§ 4-501.15, 4-501.112, and 4-501.113 and achieving a UTENSIL surface temperature of 71°C (160°F) ~~as measured by an irreversible registering temperature indicator; P or~~ **shall be validated by the use of a test kit or similar equipment**; or

**Submitter Information:**

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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.