

**Conference for Food Protection
2012 Issue Form**

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

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Title:

Clarify when handwashing is required before donning/changing gloves

Issue you would like the Conference to consider:

Employees are required to wash their hands whenever there is a risk of cross-contamination of Ready-to-eat (RTE) foods or clean food contact surfaces/equipment. Section 2-301.14 (H) of the 2009 Food Code states that hands need to be washed "before donning gloves for working with FOOD."

The intent in the Food Code is to minimize the risk of cross-contamination of RTE foods; however, gloves may be worn for other reasons than handling RTE food and they may be changed more frequently than is necessary to prevent cross-contamination. In these situations, the need to wash hands before donning/changing gloves is not consistent with the intent of the Food Code nor does it impact public health.

Section 2-301.14 (F) of the 2009 Food Code states that hands should be washed "as often as necessary to remove soil and contamination and to prevent cross contamination when changing tasks." [Bold inserted] However, Section 2-301.14 (H) states that hands should be washed "Before donning gloves for working with food." This has been misinterpreted to mean that hands must be washed every time gloves are changed even when performing the same task.

Section 2-301.14 should allow employees to change gloves without having to wash their hands when they are: (1) performing the same task without increased risk of cross-contamination and (2) when handling raw food and not increasing the risk of cross-contamination with RTE foods or clean food contact surfaces.

Public Health Significance:

2009 Food Code Section 2-301.14 (*When to Wash*) states that food employees must wash their hands before food preparation and at other times as listed in subsections A-H, including before donning gloves. As per Annex 3 - *Public Health Reasons / Administrative Guidelines - Chapter 2, Management and Personnel*, "Handwashing is a critical factor in reducing fecal-oral pathogens that can be transmitted from hands to RTE food as well as other pathogens that can be transmitted from environmental sources." Clearly the intent is to minimize the risk of cross-contamination of ready to eat foods and food contact services. There are many situations when an employee's activity has not changed yet gloves are changed. For example, a store policy may require that an employee change gloves

between the preparation of each customer's sandwich, even though the gloves are not contaminated and there is no increased risk of cross-contamination. However, based on Section 2-301.14, if the employee does not wash their hands between the glove changes, this would result in a critical violation although there is no public health risk. As per Section 2-301.14 (F), gloves should be changed "as often as necessary to remove soil and contamination and to prevent cross contamination when changing tasks." In the example above, the employee is not changing tasks and therefore changing gloves is optional as company policy or as consumer preference dictates, but there is not a public health basis for doing so.

The wording in Section 2-301.14 (H) states that hands should be washed "Before donning gloves for working with food." This has sometimes been interpreted to mean that hands must be washed every time gloves are changed, even if the activity has not changed or if there has been no contamination of the gloves or hands.

Furthermore, requiring that hands are washed before every glove change, even when an employee is repeating the same task, may actually serve as a deterrent to wearing or changing gloves. When employees can quickly change gloves without the additional step of handwashing when performing the same task, they are more likely to change gloves more frequently.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting the 2009 Food Code (as modified by the Supplement issued in 2011), ¶ 2-301.14 (H), be amended to clarify the situations when hands shall be washed before donning gloves for working with food as follows (new language shown with underline):

(H) Before initially donning gloves for working with food,^P and when changing tasks:^P AND the following language be added at the end of Annex 3, - Public Health Reasons / Administrative Guidelines - Chapter 2, Management and Personnel 2-301.14 *When to Wash:*

"Employees must wash their hands after any activity which may result in contamination of the hands. "When gloves are used to handle food, hands should be washed prior to donning gloves. If there is no change in the task being performed and there are no activities which could potentially result in cross contamination, then hands do not have to be washed between each change of gloves when performing the same task."

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