

**Conference for Food Protection
2012 Issue Form**

**Internal Number: 055
Issue: 2012 III-024**

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:

Cleaning of Food Contact Surfaces between Raw Animal Foods

Issue you would like the Conference to consider:

Deleting the allowance to use food contact surfaces with different types of raw animal foods without intermediate cleaning and sanitizing.

Annex 3, Public Health Reason, for the 2009 FDA Food Code Section 4-602.11 reads, in pertinent part:

"Regarding the possible adulteration from one species of meat to another between cleaning of food-contact surfaces, USDA/FSIS (Food Safety and Inspection Service) does not automatically consider species adulteration as a health hazard. FSIS stated in an Advance Notice of Proposed Rulemaking that species adulteration falls into a gray area between safety and economic adulteration (65 FR 14486, March 17, 2000, Other Consumer Protection Activities). FSIS will review public comments received on the species adulteration issue and further review the scientific literature and risk assessment mechanisms before declaring species adulteration a health hazard. Meanwhile, species adulteration is generally considered by FSIS as an economic issue. However, investigations by FSIS of species adulteration incidents may include a determination regarding the impact of species adulteration as a health hazard on a case-by-case basis."

Annex 3, Public Health Reason, for the 2009 FDA Food Code Section 3-302.11 reads, in pertinent part:

"In addition, raw animal foods having the same cooking temperature, such as pork and fish, shall be separated from one another during storage and preparation by maintaining adequate spacing or by placing the food in separate containers because of the potential for allergen cross-contamination or economic adulteration via inadvertent species substitution."

Public Health Significance:

The provisions described above may result in cross contamination of foods with allergens as well as possible economic adulteration.

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) be amended as follows (deleted language shown with strike-through):

Section 4-602.11(B)

~~(B) Subparagraph (A)(1) of this section does not apply if the food contact surface or utensil is in contact with a succession of different raw animal foods each requiring a higher-cooking temperature as specified under § 3-401.11 than the previous food, such as preparing raw fish followed by cutting raw poultry on the same cutting board.~~

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