

**Conference for Food Protection
2012 Issue Form**

**Internal Number: 047
Issue: 2012 III-025**

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:

Dual-step hand cleanse-sanitize protocol without water

Issue you would like the Conference to consider:

Safe and proper changing of single-use gloves at catered events where potable running water is unavailable, is a current danger to public health. Hands must be washed before donning gloves per 2009 FDA *Food Code*, Section 2-301.14(H).

An effective hand cleansing, "equivalent or superior to hand washing with soap and water" (per *Journal of Food Protection*, Vol. 73, No. 12, 2010, Pages 2296-2300, attached) as specified in Section 2-301.12 of the *FDA Food Code*, can be achieved by using alcohol-based hand antiseptic first as a soap substitute to loosen contaminants with a 15 second scrub cycle, followed by their removal onto a single-use paper towel. This cleaning step is followed by a high impact kill step, applying the hand sanitizer to the pre-cleaned hand and allowing it to air dry per label instructions.

The latest testing of this hand cleansing/degerming technique shows it to be effective in the presence of organic food soils and if norovirus is the target pathogen, norovirus-effective sanitizers are available. (See attachment titled *Comparison of the Activity of Alcohol-Based Handrubs Against Human Noroviruses Using the Fingerpad Method and Quantitative Real-Time PCR*)

This adds an additional safety factor to support incorporation of the method into food safety practices. It gives operators a choice and its simplicity and portability adds to compliance. This protocol is not a substitute for handwashing in stationary facilities where cleaning can be accomplished per Section 2-301.12. The economics keep this innovation reserved for special situations.

[Note: After the near unanimous vote for adoption by Council III , a similar issue, III-027, was extracted during the Assembly of Delegates, citing the need for additional testing which has now been concluded along with an additional four years of field testing under the guidance of the Southern Nevada Health District (SNHD). SNHD also cleared this intervention for school foodservice use during water outages, and it has been in use for the past two years.]

Public Health Significance:

Potential contamination of ready-to-eat foods is increased in situations where access to soap and potable running water is limited or simply unavailable. The new proposed option

increases the likelihood of effective hand degerming in those situations, including its use between single-use glove changes.

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 (new language shown with underline and deleted language shown with strike-through):

5-203.11 Handwashing Sinks (A)(B)

(C) If approved, when food exposure is limited and handwashing sinks are not conveniently available, such as in some mobile or temporary food establishments or at some vending machine locations, employees may use chemically treated towelettes for handwashing or a regimen of sequential application of hand antiseptic wherein the first application is treated as a handwash with full scrubbing action for 15 seconds and then, while wet, wiped off with a single-use paper towel, immediately followed by a second application which is allowed to dry per standard label instructions. (i) Said hand antiseptic shall meet requirements of 2-301.16. Said hand antiseptic shall have supporting test data indicating statistical equivalence to a standard handwash in hand degerming.

Submitter Information:

Name: Jim Mann
Organization: Handwashing For Life Institute
Address: 1216 Flamingo Parkway
City/State/Zip: Libertyville, IL 60048
Telephone: 847-918-0254 Fax: 847-918-0305
E-mail: jmann@handwashingforlife.com

Attachments:

- "Comparison of the Activity...Handrubs Against Human Noroviruses"
- "SaniTwice: A Novel Approach to Hand Hygiene ..."
- "Comparative Efficacy of Alcohol Hand Sanitizers...against Noroviruses..."

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.