

**Conference for Food Protection  
2012 Issue Form**

**Internal Number: 011  
Issue: 2012 I-037**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

*All information above the line is for conference use only.*

---

**Title:**

Designation of Manual Warewashing Wash Solution Temperature as a Core Item

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

To designate Section 4-501.19 of the 2009 FDA Food Code as a Core Item, thereby changing the designation for the provision that, "The temperature of the wash solution in manual warewashing equipment shall be maintained at not less than 43°C (110°F) or the temperature specified on the cleaning agent manufacturer's label instructions" from a Priority Foundation to a Core Item.

**Public Health Significance:**

Effective manual warewashing in retail food establishments is dependent on a number of variables including the cleaning agent used, the type of manual washing processes, the equipment used, the volume and type of wares being washed, as well as where they originate (i.e., hot or cold environments). The temperature of the water used for washing is also a variable and no specific temperature is required to assure an effective process.

The washing step is intended to ensure that the wares/equipment being cleaned are visually free of soil prior to sanitization. The washing step is not intended to be a sanitizing step and therefore is not the step that reduces risk or impacts public health. A Priority Foundation item is, by definition, "an item that requires the purposeful incorporation of specific actions, equipment or procedures by industry management to attain control of risk factors that contribute to foodborne illness or injury."

In practice, maintaining a specific wash solution temperature for manual warewashing can be challenging under certain situations such as washing in refrigerated environments in meat markets. To overcome this challenge, food retailers have worked with their chemical suppliers to provide cleaning agents (detergents) that work effectively in a variety of different environments and in various water temperatures with consistent results. Other methods such as applying force to the surface of wares via brush and/or spray devices have proven very effective in removing soil that can easily be rinsed prior to being sanitized, regardless of the water temperature. Employees are more likely to wash wares effectively and for a longer time if doing so in water that is comfortable and which achieves the intended purpose.

A Core Item is defined as "an item that usually relates to general sanitation, operational controls, sanitation standard operating procedures (SSOPs), facilities or structures,

equipment design, or general maintenance." Other provisions in the Food Code that recommend water temperatures for washing are not designated as Priority Foundation and changing Section 4-501.19 to a Core Item would be more appropriate and consistent. Furthermore, the CFP Criticality Committee (CFP, Crit Item, recommendation for changing a Food Code Section, Chapter 2 (part) 3 and 4 and terminology, summary 8-16-07 ) overwhelmingly (>77%) recommended that Section 4-501.19 be classified as a Core item and not a Priority Foundation.

**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), Section 4-501.19, be revised to reclassify the designation from a Priority Foundation <sup>(Pf)</sup> item to a Core <sup>(C)</sup> item as indicated below (new language shown with underline and deleted language shown with strike-through):

4-501.19 Manual Warewashing Equipment, Wash Solution Temperature.

The temperature of the wash solution in manual warewashing equipment shall be maintained at not less than 43°C (110°F) or the temperature specified on the cleaning agent manufacturer's label instructions. Pf C

**Submitter Information:**

Name: Terry Levee  
Organization: Food Marketing Institute  
Address: 2345 Crystal Drive Suite 800  
City/State/Zip: Arlington, VA 22202  
Telephone: 202-220-0659 Fax:  
E-mail: tlevee@fmi.org

*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.*