

**Conference for Food Protection
2014 Issue Form**

**Internal Number: 054
Issue: 2014 III-019**

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:

Clarify hand washing requirement switching from raw to ready-to-eat foods

Issue you would like the Conference to consider:

The 2013 FDA Food Code, section 2-301.14 (G), requires hands to be washed when switching from working with raw foods to working with ready-to-eat foods. There are no exceptions to this requirement even when precautions are taken to prevent cross contamination. For example, even if bare hand contact with raw food is prevented by the use of dedicated tongs or single-use disposable gloves which can be removed without contaminating hands, employees must still wash hands when switching from working with raw foods to working with ready-to-eat foods.

A rationale for this requirement is that hands could still become contaminated when removing the glove. This will only happen, however, if the person removing the disposable gloves touches the area of the gloves that touched the raw product. This can be easily prevented by peeling the glove inside out from the back of the wrist or shaking off the glove when the glove is removed. On the other hand, if hands directly touch raw foods or contamination of the hands is not prevented when working with raw foods then the current requirement for washing hands when switching from working with raw food to working with ready-to-eat food must be followed.

It is not uncommon for food handlers to cook raw foods and also participate in other food handling tasks such as sandwich assembly. In these operations it is often impractical for hand washing to take place each time a raw food is handled and before conducting other tasks that may involve ready-to-eat foods. The most effective way to prevent cross contamination is to ensure that the hands do not directly touch the raw product thus negating the food safety need to wash hands after this task.

Public Health Significance:

Using dedicated tongs or properly removed disposable gloves to handle raw foods can prevent the hands from coming into contact with the raw product and becoming contaminated. Requiring hand washing when switching from raw to cooked foods, even if dedicated tongs or disposable gloves are used, provides no additional food safety benefit and may even serve to discourage the use of these barriers when handling raw products since hands still have to be washed anyway.

The recent study on Ground Beef Handling and Cooking Practices in Restaurants in Eight States published in the Journal of Food Protection showed that no hand washing was observed between the handling of ground beef and either ready-to-eat foods or cooked ground beef in 62% of restaurants where bare hands were used to handle ground beef. This data indicates that focus on preventing bare hand contact with raw foods through the proper use of dedicated tongs or disposable gloves would be a more effective control than hand washing after handling raw food products with bare hands. ("Ground Beef Handling and Cooking Practices in Restaurants in Eight States" study is attached).

Recommended Solution: The Conference recommends...:

that a letter be sent to FDA requesting the 2013 Food Code be amended as follows (new language is in underline format):

2-301.14 When to Wash

(G) When switching between working with raw FOOD and working with READY-TO-EAT FOOD if bare hand contact with raw food is not prevented through the use of dedicated utensils or single use disposable gloves which can be easily removed without contaminating hands;^P

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Attachments:

α "Ground Beef Handling and Cooking Practices in Restaurants in Eight States"

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.