

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 III-011

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

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Issue History:

This is a brand new Issue.

Title:

Reduce risk of cross-contamination by hands.

Issue you would like the Conference to consider:

Public health is best protected when code language is risk-based and easy to understand. When code language is not clear or when alternate interpretations lead to recommendations or to enforcement decisions that are not based on risk, compliance declines. This results in increased risk to public health. The handwashing section of the 2013 FDA Food Code (2-301.14) is a section that could benefit from further clarification.

2013 FDA Food Code §2-301.14(G) requires that hands be washed "When switching between working with raw FOOD and working with READY-TO-EAT FOOD." This language is based on the assumption that there was a contamination event (hands became contaminated) during the handling of the raw FOOD (e.g., through direct contact with the hand), but contamination of the hands does not always occur when handling raw FOOD and yet this section still requires hands to be washed.

In many operations, to help avoid cross contamination, UTENSILS (SINGLE-USE or multi-use) are used as a means to handle the raw FOOD. When contamination of hands and/or gloves is prevented through the use of UTENSILS, this route of hand based cross-contamination is eliminated.

The use of UTENSILS to prevent contamination is a far more reliable method for protecting public health than relying on proper handwashing to reduce contamination. Other sections of the Food Code (3-301.11(B)) recognize the value of UTENSILS in keeping hands and food separate.

The handwashing section of the Food Code, as written, needs further clarification to help ensure requirements to wash hands applies when contamination of the hands occurs.

Public Health Significance:

Annex 3 of the Food Code outlines that "Handwashing is a critical factor in reducing fecal-oral pathogens that can be transmitted from hands to ready-to-eat (RTE) food as well as

other pathogens that can be transmitted from environmental sources. Many employees fail to wash their hands as often as necessary and even those who do may use flawed techniques."

By codifying allowance of another important method of "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," positive public health outcomes can be promoted.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that Section 2-301.14(G) of the 2013 Food Code be amended as follows (language to be added is underlined):

2-301.14 When to Wash.

FOOD EMPLOYEES shall clean their hands and exposed portions of their arms as specified under § 2-301.12 immediately before engaging in FOOD preparation including working with exposed FOOD, clean EQUIPMENT and UTENSILS, and unwrapped SINGLESERVICE and SINGLE-USE ARTICLES^P and:

(G) Except when UTENSILS are used to prevent contact with raw FOOD, when switching between working with raw FOOD and working with READY-TO-EAT FOOD.

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