**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 III-029**

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| **Council Recommendation:** | Accepted as  Submitted |  | Accepted as Amended |  | No Action |  |
| **Delegate Action:** | Accepted |  | Rejected |  |  |  |

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

**Issue History:**

This is a brand new Issue.

**Title:**

Sanitizer Contact Time

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

Define the term "contact time" as it relates to chemical sanitizers. This term is used frequently throughout Section 4-703.11 of the 2013 FDA Food Code. Does "contact time" mean complete submersion in the sanitizer for the specified time frame or does it refer to the time the food contact surface must remain wet with the sanitizer? Frequently, the label instructions on sanitizers do not clarify if the food contact surface needs to be submerged or just remain wet for the designated amount of time. Given the wide range of contact times for sanitizers (few seconds to 10 minutes), what is the expectation in regard to the sanitizer remaining in contact with the food contact surface? This is being interpreted different ways by individuals conducting food establishment inspections.

**Public Health Significance:**

Applying a chemical sanitizer at appropriate concentrations and time in contact with food contact surface is essential for pathogen destruction. If sanitizer label is unclear on how the sanitizer is to remain in contact (submersion vs. remaining wet) with the food contact surface, pathogen destruction may not occur. In absence of clear labeling instructions, the FDA Food Code can provide guidance on what contact time means.

**Recommended Solution: The Conference recommends...:**

That a letter be sent to the FDA requesting an interpretation that clarifies the term "contact time" within the FDA Food Code and that the final interpretation document be posted to the FDA Food Code Reference System.

**Submitter Information 1:**

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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.