**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 I-009**

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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:**

Creation of a Committee - Clarification of the Term “Easily Cleanable”

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

The current FDA Food Code definition of "easily cleanable" is not aligned with National Sanitation Foundation (NSF)/American National Standards Institute (ANSI) 170.

Per NSF/ANSI 170, the definition of "easily cleanable" is:

"Manufactured so that food and other soiling material may be removed by manual cleaning methods."

Per the 2013 Food Code, the definition of "easily cleanable" is:

(1) **"Easily cleanable"** means a characteristic of a surface that:

(a) Allows effective removal of soil by normal cleaning methods;

(b) Is dependent on the material, design, construction, and installation of the surface; and

(c) Varies with the likelihood of the surface's role in introducing pathogenic or toxigenic agents or other contaminants into FOOD based on the surface's APPROVED placement, purpose, and use.

(2) **"Easily cleanable"** includes a tiered application of the criteria that qualify the surface as EASILY CLEANABLE as specified in Subparagraph (1) of this definition to different situations in which varying degrees of cleanability are required such as:

(a) The appropriateness of stainless steel for a FOOD preparation surface as opposed to the lack of need for stainless steel to be used for floors or for tables used for consumer dining; or

(b) The need for a different degree of cleanability for a utilitarian attachment or accessory in the kitchen as opposed to a decorative attachment or accessory in the CONSUMER dining area.

The NSF/ANSI definition of "easily cleanable" states that food equipment must be manufactured so that food and other soiling material may be removed by manual cleaning methods which would preclude most surfaces cleaned via "cleaned-in-place" (CIP) methods. The Food Code definition of "easily cleanable" refers to characteristics of a surface that allows for effective removal of soil by "normal cleaning methods". Because the term "normal cleaning methods" is not defined, the Food Code definition of "easily cleanable" does not preclude surfaces that are cleaned via CIP.

The NSF/ANSI definition of "easily cleanable" is narrower than the Food Code's and therefore more precise. In principle this suggests that the Food Code definition should be altered to better align with the one in the NSF/ANSI standards. However, the Clean-In-Place Committee felt that refining the definition of "easily cleanable" is outside of the charge to the committee. It was also felt by the committee that refining the definition of "easily cleanable" would be useful as many operators and regulators struggle to understand what it means to be "easily cleanable."

**Public Health Significance:**

Without clarification and alignment, the potential for inconsistent and subjective interpretation of the term "easily cleanable" is increased. This lack of clarity is exacerbated by the fact that there is limited research of clean in place systems to ascertain relative food safety risk associated with improperly cleaned and/or sanitized CIP surfaces compared to manually or machine cleaned surfaces. One of the primary ideals behind the Program Standards is to establish a clear, consistent regulatory framework void of ambiguity. Without clear, unambiguous language, operators and regulators will continue to make their own interpretations resulting in inconsistent regulation.

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

that a committee be created to expand on the work begun by the 2016 - 2018 Clean In Place Committee, but with a narrow focus to review the NSF/ANSI (National Sanitation Foundation/American National Standards Institute) and the FDA Food Code definitions of "easily cleanable." The committee charges are:

1. Clarify the definition of "easily cleanable" in the Food Code regarding food equipment known to have designs that depend upon clean in place (CIP) processes for safety but do not allow for easy inspection, cleaning, and sanitizing access of its food contact surfaces;
2. Align the definition of "easily cleanable" in the Food Code with the definition used in the NSF/ANSI Standards; and
3. Report back to the 2020 Biennial Meeting the committee findings and recommendations.

**Submitter Information:**

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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.