**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 I-034**

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| **Council Recommendation:** | Accepted asSubmitted |  | 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:**

Amend Food Code – Remove Pf from Handwashing Water Temperature

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

A recommendation is being made to remove the priority foundation designation from FDA Food Code Section 5-202.12 (A).

The FDA Food Code Section 5-202.12 (A) requires handwashing sinks to be equipped to provide water at least 100°F, and considers this to be a priority foundation violation, which requires timely correction, as discussed in Chapter 8.

**Public Health Significance:**

Chapter 1 of the FDA Food Code defines a priority foundation item as:

"...a provision in this Code whose application supports, facilitates or enables one or more PRIORITY ITEMS.

(2) "**Priority foundation item**" includes 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 such as personnel training, infrastructure or necessary equipment, HACCP plans, documentation or record keeping, and labeling..."

Based on this definition, the temperature of water used for handwashing must be important to attain control of the risk factors. However, research has been done to show that the temperature of water used in handwashing does not impact pathogens removed from hands during handwashing1. The temperature of the water serves as a comfort factor for the food employee who is participating in handwashing. This means water temperature is more suited to be defined as a core item, which is an item that is not a priority or priority foundation violation and "includes an item that usually relates to general sanitation, operational controls, sanitation standard operating procedures (SSOPs), facilities or structures, equipment design, or general maintenance."

References (noted above with superscript numeral)

1. Michaels et al Food Service Technology, 2, pp. 139-149

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

that a letter be sent to the FDA requesting that Section 5-202.12 (A) of the most current edition of the Food Code be amended to remove the priority foundation designation (language to be deleted is in strikethrough format):

(A) A HANDWASHING SINK shall be equipped to provide water at a temperature of at least 38°C (100°F) through a mixing valve or combination faucet. ~~Pf~~

**Submitter Information:**

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**Supporting Attachments:**

* "Water temperature as a factor in handwashing efficacy"

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.