

**Conference for Food Protection
2018 Issue Form**

Issue: 2018 I-031

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:

Amend Food Code - Storage in Toilet Rooms

Issue you would like the Conference to consider:

Despite the risk associated with Norovirus the storage of food, clean utensils, single service utensils and food equipment in toilet rooms is only a core violation.

Public Health Significance:

The recently released study "*Quantitative Risk Assessment of Norovirus Transmission in Food Establishments: Evaluating the Impact of Intervention Strategies and Food Employee Behavior on the Risk Associated with Norovirus*" states that Norovirus is the leading cause of foodborne illness globally and within the United States. Restaurants are the most common setting (64%) of food preparation reported in outbreaks in the United States. The contamination of hands in the restrooms, directly from the source or from objects, is the major route of norovirus transmission in the retail environment. Large numbers of virus are shed in the vomit and stools of infected individuals, primarily during the period of active symptoms, with as much as 10^{12} genome equivalent copies of norovirus (GEC NoV) per gram of feces in symptomatic individuals with diarrhea, and 8×10^5 GEC NoV per milliliter in vomit. Duration of viral shedding in adults lasts 20-30 days.

Norovirus causes acute onset of vomiting (often explosive) and diarrhea (also often explosive) which can contaminate surfaces and become airborne increasing the chances of additional infections. Viral bio-aerosols aka toilet plume aerosol after viral contamination has been shown to be produced up to, and even after, 7 flushes (source www.ncbi.nlm.nih.gov; National Center for Biotechnology Information). This could further contribute to the aerosolization of Norovirus or Hepatitis A possibly leading to transmission.

Noroviruses can be highly contagious, and it is thought that an inoculum of as few as 10-18 viral particles may be sufficient to infect an individual. Transmission occurs via foodborne and person-to-person routes, airborne inhalation of vomitus droplets, and also through contact with contaminated environmental surfaces. Good evidence exists for transmission

due to aerosolization of vomitus that presumably results in droplets contaminating surfaces or entering the oral mucosa and being swallowed.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that the following sections of the most current edition of the Food Code be amended to change the provision designation from core to priority foundation violations (extracted language included below; new designation of ^{Pf} is underlined):

3-305.12 Food Storage, Prohibited Areas.

Food may not be stored:

...(B) In toilet rooms;^{Pf}

4-401.11 Equipment, Clothes Washers and Dryers, and Storage Cabinets, Contamination Prevention.

(A) Except as specified in ¶(B) of this section, EQUIPMENT, a cabinet used for the storage of FOOD, or a cabinet that is used to store cleaned and SANITIZED EQUIPMENT, UTENSILS, laundered LINENS, and SINGLE-SERVICE and SINGLE-USE ARTICLES may not be located:

...(2) In toilet rooms;^{Pf}

4-903.12 Prohibitions.

(A) Except as specified in ¶(B) of this section, cleaned and SANITIZED EQUIPMENT, UTENSILS, laundered LINENS, and SINGLE-SERVICE and SINGLE-USE ARTICLES may not be stored:

...(2) In toilet rooms;^{Pf}

Submitter Information 1:

Name: Rodney Blanchard
Organization: Great Lakes Conference On Food Protection
Address: 145 Wood Street
City/State/Zip: Petersburg, MI 49270
Telephone: 517-243-8896
E-mail: blanchardr1@michigan.gov

Submitter Information 2:

Name: Brandon Morrill
Organization: Great Lakes Conference On Food Protection
Address: 220 West Garfield
City/State/Zip: Charlevoix, MI 49720
Telephone: 231-547-7668
E-mail: b.morrill@nwhealth.org

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.