

CUYAHOGA COUNTY BOARD OF HEALTH

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December 6, 2019

Chip Manuel PhD
GOJO Industries
One Gojo Plaza, Suite 500
Akron, OH 44311

Dear Dr. Manuel,

Thank you for sharing your time and information regarding the Purell Food Service Surface Sanitizer. As we discussed, there are several inherent barriers to sanitarians in Ohio being able to properly understand and apply the Ohio Uniform Food Code relative to alternative and innovative food contact sanitizers, not the least of which is the language contained within the code.

When speaking with my colleagues around the state, we agree that based on our training and interpretation of the food code, first as new sanitarians and continuing through today, the trio of chlorine, iodine and quaternary ammonia sanitizers are the default choices for operators and inspectors due to their placement in the language. Over time, they have become the most commonly recognized and suggested products. With their specific concentrations being defined in the food code, it also makes it easier for sanitarians to understand and explain how to use these products.

However, the Ohio Uniform Food Code also states that any EPA-approved sanitizer that is food grade can be used on tables, utensils and all other food contact surfaces according to its label. Thus, when our agency's sanitarians see your PFSS product, we know it is approved for use. My concern is that without prior awareness and knowledge of such products and without a clearly-defined explanation of alternative active ingredients within the food code language, these products may be challenged and disapproved for use by many sanitarians, particularly those lacking extensive experience.

My suggestion for sustained clarity on this issue would be to make revisions to the FDA Model Food Code that would specifically state that chlorine, iodine and quaternary ammonia are not the only approved products. Given current conditions, it will certainly take time for new sanitarians and their trainers to understand and adopt innovative options.

Since your products are pre-mixed and ready for use, we would not require our food operators to use a kit to test their concentrations. We would suggest that sanitarians have a test kit when inspecting in case they are worried that an operator is improperly diluting the product.

Thank you for your efforts to bring increased awareness and efficiency to food service sanitization. Please don't hesitate to contact me for additional information.

Best regards,

Suzanne Hrusch MPH, RS
Program Manager, Food Protection Unit
Cuyahoga County Board of Health