

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 III-020**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

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**Issue History:**

This is a brand new Issue.

**Title:**

Amend Food Code to Require Detergent for Equipment Cleaning

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

Under FSMA, hot water is not considered effective for removal of allergens. Currently the 2017 Food Code appears to allow the use of hot water without chemicals, for cleaning of equipment under 4-603.14 Wet Cleaning. This may allow allergens to persist on a food contact surface, resulting in cross cross-contact.

**Public Health Significance:**

Allergen proteins can difficult to remove from food contact surfaces as they can be sticky or even baked on/cooked onto a surface. Inadequate cleaning has been identified as a contributing factor for cross-contact; and cross-contact is one of the major causes of allergen recalls. Prevention measures for cross contact include the creation of a cleaning procedure proven effective for allergen removal. The use of hot water alone for cleaning of food contact surfaces, has not been proven effective for removal of allergens.

A reduction in cross contact would reduce the number of recalls within the food industry while also preventing adverse health outcomes in consumers.

Currently, the 2017 Food Code allows for the use of hot water only for cleaning equipment. This practice is prohibited under FSMA as hot water is considered ineffective for the removal of allergens. If adopted, the following language will allow for effective removal of allergens during cleaning.

The annex references chemical use through this section, but the specific language was not brought into the code itself.

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

A letter be sent to FDA to change Section 4-603.14 to address removal of allergens from equipment in the most current edition of the Food Code.

4-603.14 (A) EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be effectively washed to remove or completely loosen soils and major food allergens by using the manual or mechanical means necessary. ~~such as the application of detergents containing wetting agents and emulsifiers; acid; alkaline, or abrasive cleaners; hot water brushes; scouring pad; high pressure sprays; or ultrasonic devices.~~

**Submitter Information:**

Name: Brandon Morrill  
Organization: Great Lakes Conference on Food Protection  
Address: 705 North Zeeb  
City/State/Zip: Ann Arbor, MI 48103  
Telephone: 7343691062  
E-mail: MorrillB@washtenaw.org

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