

**Conference for Food Protection
2020 Issue Form**

Issue: 2020 III-021

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

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Issue History:

This issue was submitted for consideration at a previous biennial meeting, see issue: 2018 COUNCIL III 027; new or additional information has been included or attached.

Title:

Amend Food Code: Hand Cleanse-Sanitize Protocol Not Requiring Water

Issue you would like the Conference to consider:

The December 2019 Supplement to the 2017 Food Code removes the use of chemically treated towelettes as a hand washing protocol. This leaves operators without a convenient choice for water-compromised locations. Inconvenience limits hand washing and results in a public health risk.

Food service situations with compromised potable water supply are many and growing as operators respond to the public's demand to have safe food convenient to their daily trail. This results in food being prepared and served in venues without running water for hand washing. Gloves are not the full answer as when they are damaged or contaminated or a task change is required, there is no reasonable option to clean hands between glove changes.

Harvesting produce occurs in water-compromised fields. Workers contaminate ready-to-eat foods and inconvenient access to water results in infrequent soap-water hand washes.

A range of compromised water systems were approved by jurisdictions around the country based on the presence of water rather than its effectiveness. The flow rate in these options is normally far below the effective flow rate of 2.0 gallons per minute, specified in the Uniform Plumbing Code (UPC).

The most common interpretation of an alternative "approved method" for hand washing at venues without running water is a jug of water actuated by manually depressing a release button or lever, a cleaning agent, toweling and a waste receptacle to catch wastewater.

A cleanse-sanitize protocol was developed for the US Military in 2006 and picked up by special water-short venues in the Southern Nevada Health District, including use by Clark County Schools during water outages. Along with years of use, several independent research studies have been added, confirming the cleanse-sanitize antimicrobial effectiveness against bacteria and viruses.

Separate studies also identify three hand sanitizers effective on norovirus, the best of those three was selected by Clark County and other noro-concerned operators like the cruise ships and the world's largest 5 star resort - the Venetian and Palazzo properties. This protocol's superior convenience elevates compliance over the traditional alternative using a jug of water.

Under the 2013 FDA Food Code, Subparagraph 2-301.16 (A)(3) requires hand antiseptics "Be applied only to hands that are cleaned as specified under § 2-301.12. Pf" It has been demonstrated, documented and published in credible, peer-reviewed journal (Journal of Food Protection) that effective hand cleansing, "equivalent or superior" to hand washing with soap and water as specified in Section 5-203.11, can be achieved by applying an excess of alcohol based hand sanitizer as the cleaning agent, scrubbing for 15 seconds, wiping on a single-use towel, followed by an application of alcohol based hand sanitizer following normal label usage instructions.

The latest testing of this hand cleansing/degerming technique shows it to be effective in the presence of organic food soils. This adds an additional safety factor to support incorporation of the method into food safety practices.

This protocol is not a substitute for hand washing in stationary facilities where cleaning can be accomplished per Section 2-301.12.

Public Health Significance:

Potential contamination of ready-to-eat foods by inadequately washed or unwashed hands is increased in situations where access to running water is limited or unavailable. The new proposed option increases the odds of effective hand degerming in those situations.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting the most current edition of the Food Code be amended as follows (new language underlined):

5-203.11 Handwashing Sinks

(D) When food exposure is limited and handwashing sinks are not conveniently located, such as at outdoor events, mobile or temporary food service, and vending machine locations, employees may use a regimen using hand antiseptic as the cleansing agent wherein this step is treated as a handwash with full scrubbing action for 15 seconds and then, while wet, wiped off with a single-use paper towel, immediately followed by a second application which is allowed to dry per standard label instruction.

(1) Said hand antiseptic shall meet requirements as specified in Section 2-301.16.

(2) Said hand antiseptic shall have supporting test data indicating statistical equivalence to a standard handwash in hand degerming.

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Supporting Attachments:

- "JFP SaniTwice article"
- "Farm Hands Cleansing"
- "JFP Hand Hygiene Regimens"
- "JFP Hand Hygiene Interventions - part 1"
- "JFP Hand Hygiene Interventions - part 2"

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.