May 27, 2016

Stan Hazan  
NSF International  
789 N. Dixboro Road  
Ann Arbor, MI 48105

Dear Stan:

As you are aware, the mission of the Conference for Food Protection (CFP/Conference) is to promote food safety through collaboration and partnership among federal, state, and local regulatory agencies; the food industry; academia; and consumer organizations.

On April 16-20, 2016 the Conference met in Boise, Idaho. The three Councils deliberated on a total of 117 issues. Of these, the Assembly of State Delegates (a group of representatives from 44 States, the District of Columbia, and the territory of Guam) accepted 116 of the council recommendations.

One of the accepted Issues instructed the Conference Chair to send a letter to NSF International recommending the creation of a working group to review and update the existing ANSI/NSF Standard 12 – Automatic Ice Making Equipment for cleaning and sanitizing certification with participation from academia and organizations such as the Association of Official Analytical Communities (AOAC) and the American Society of Testing and Materials (ASTM) with peer review process elements to ensure:

- Food contact surfaces of ice making equipment are readily accessible for inspection and effective cleaning and sanitization.

- That the performance certification test methods used for cleanability and sanitization of new equipment's food contact surfaces has correlation to cleanability and sanitization of those same surfaces when in continuous use in the work place.

A copy of Issue 2016-I-009 that was accepted as submitted by Council I and approved by the Assembly of State Delegates has been enclosed with this letter. It provides additional information about the Issue that was considered and its Public Health significance.
Your assistance in keeping the Conference for Food Protection informed of future developments regarding this matter is greatly appreciated.

Kind regards,

[Signature]

Patrick Guzzle, Chair
Conference for Food Protection

Enclosure (1)

Cc: CFP Executive Board
Dr. David McSwane, Executive Director
Issue History:
This is a brand new issue.

Title:
IMC 5 - Working Group Formation to Update NSF/ANSI 12

Issue you would like the Conference to consider:
American National Standards Institute (ANSI) / National Sanitation Foundation (NSF) Standard 12: Automatic Ice Making Equipment sets forth requirements that include specifications regarding the ice machine equipment design, construction and materials of composition. Additionally, the Standard documents the methods and criteria required to show effectiveness of cleaning and sanitizing of the food zone surfaces. "The NSF Mark on a product gives consumers and retailers assurance that the product has been tested and meets the requirements of the Standard".

This Standard is designed to evaluate new equipment and is not aligned to manufacturer cleaning frequency recommendations. The test protocol does not take into account the prolonged use of the equipment in commercial applications and the impact to cleanability.

Based on the 2013 FDA Food Code Section 4-602.11 (E) (4), ice making equipment should be cleaned "at frequency specified by the manufacturer". Survey data collected during the CFP Ice Maker 2014-2016 Committee work suggests that the manufacturer's recommended cleaning frequencies are not supported by research data.

Both the Food Code and NSF/ANSI 12 acknowledge that accessibility to internal food contact surfaces is critical for proper cleaning, sanitizing and inspection. However, it is common that some of the areas of the equipment are difficult to reach without a complicated disassembly process, which limits proper cleaning, sanitization and inspection of the equipment.

Public Health Significance:
Visible ice machine mold and soil accumulation appears to be a prevalent issue in commercial ice machines and may be from a variety of factors:
- Cleaning and sanitizing may not be performed at a specific frequency to preclude accumulation of soil or mold.
• The procedure and chemicals used may be insufficient to accomplish the intended purpose of preventing microbial growth.

• The machine design may be such that internal food contact surfaces are not readily accessible for cleaning, sanitizing and routine inspection.

Many internal surfaces of commercial ice machines are food contact surfaces and are subject to the ANSI sanitation standards applicable to food equipment. Current ice machine designs which passed the existing performance certification standards are not always accessible for cleaning and inspection and may require tools that are not commonly available to the cleaning personnel or inspectors. Tools listed in the Food Code (Section 4-202.11) such as "screwdrivers, pliers, open-end wrenches, and Allen wrenches" may be available to maintenance, which is not always at the site during times when the cleaning and sanitization is performed, or when the equipment is inspected.

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

that a letter be sent to NSF International recommending the creation of a working group to review and update the existing American National Standards Institute (ANSI) / National Sanitation Foundation (NSF) 12 Automatic Ice Making Equipment Standard for cleaning and sanitizing certification with participation from academia and organizations such as the Association of Official Analytical Communities (AOAC) and the American Society of Testing and Materials (ASTM) with peer review process elements to ensure:

• Food contact surfaces of ice making equipment are readily accessible for inspection and effective cleaning and sanitization.

• That the performance certification test methods used for cleanability and sanitization of new equipment's food contact surfaces has correlation to cleanability and sanitization of those same surfaces when in continuous use in the work place.

**Submitter Information 1:**
Name: Peter Voss  
Organization: Co-Chair, Ice Maker Equipment Cleaning and Sanitizing Committee  
Address: Ecolab655 Lone Oak Drive  
City/State/Zip: Eagan, MN 55121  
Telephone: 6517955981  
E-mail: peter.voss@ecolab.com

**Submitter Information 2:**
Name: Tim Tewksbary  
Organization: Co-Chair, Ice Maker Equipment Cleaning and Sanitizing Committee  
Address: Ohio Department of Agriculture8995 East Main Street  
City/State/Zip: Reynoldsburg, OH 43068  
Telephone: 6147236250  
E-mail: Timothy.tewksbary@agri.ohio.gov

*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.*