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Approved 4/20/2016

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COMMITTEE NAME: Produce Wash Water Committee (PWWC)

DATE OF REPORT: *Initial fall progress report* *Spring progress report* *Second fall progress report*

Date submitted: 6/21/2019

Date amended (if applicable): *Click here to enter a date.*

Date accepted by Executive Board: *Click here to enter a date.*

COMMITTEE ASSIGNMENT: *Council I* *Council II* *Council III* *Executive Board*

REPORT SUBMITTED BY: *Anna Starobin, Jaime Hernandez*

COMMITTEE CHARGE(S):

Issue # 2018-III-013: Re-Create – Produce Wash Water Committee _____

1. *Develop a Produce Washing and Crisping Guidance document for Retail Food Establishments which includes the following:*
 - a. *Detail the handling, cleaning, and sanitation practices related to washing and crisping of produce.*
 - b. *Describe the criteria for produce crisping vs. produce washing.*
 - c. *Clarify the types of chemicals and their use for washing and crisping.*
2. *Report findings and recommendations back to the 2020 Conference for Food Protection Biennial Meeting.*

COMMITTEE WORK PLAN AND TIMELINE:

1. The Committee will address the charge of *Developing a Produce Washing and Crisping Guidance document for Retail Food Establishments, which includes:*
 - (a) *Detailing the handling, cleaning, and sanitation practices related to washing and crisping of produce,*
 - (b) *Describing the criteria for produce crisping vs. produce washing,*
 - (c) *Clarifying the types of chemicals and their use for washing and crisping.*
2. *Created subgroup will continue working on the guideline draft. (complete)*
3. *The chapters of the future guideline will be created. (complete)*
4. *Washing and crisping methods, considerations, and comments will be listed in a table as an example of possible procedures, their benefits and deficiencies. (complete)*
5. *Pre-requisite SOPs for produce washing and crisping will be prepared and included into the guideline. (Outside of the committee charge, per CFP Board members Keith Jackson and Christine Applewhite)*
6. *Diagram/decision tree for using various chemicals used in produce washing with jurisdictions regulated those chemicals will be created. (complete)*
7. *After developing the guidance document, said document will be peer-reviewed between Committee members to ensure that all details from the charge have been fulfilled. June-July 2019 (in progress, currently addressing comments received from committee members and FDA)*
8. *After completion of the charge, the Committee will report back to the 2020 Conference for Food Protection Biennial Meeting.*
9. *Issues identified during the committee work will be prepared and submitted to CFP (September-December 2019)*

COMMITTEE ACTIVITIES:

Overview of committee activities:

1. *Committee member roster approved.*
2. *A step-by-step produce washing, and crisping procedure developed. Relevant references are searched and included.*
3. *The types of chemicals and their use for washing and crisping clarifies.*

Literature/Presentations

:

- “Safe Washing and Crisping of Produce.” Jim Gorny, Ph.D., Produce Marketing Association.
<https://www.pma.com/content/articles/2017/06/safe-washing-and-crisping-of-produce>
- “Post-harvest Water and Use of Sanitizers.” Laura Strawn, Rob Williams, Virginia Cooperative Extension.
https://www.hort.vt.edu/producesafety/producers/documents/Topic%20files/PH%20Postharvest%20water%20and%20use%20of%20Sanitizers_StrawnWilliams.pdf
- “Introduction to Postharvest Water Disinfection Management.” Trevor Suslow, Ph.D., University of California, Davis.
https://ag.umass.edu/sites/ag.umass.edu/files/pdf%2Cdoc%2Cppt/suslow_wash_water_ppt.pdf
In reference to Charge #1, “Develop a Produce Washing and Crisping Guidance document for Retail Food Establishments”, the committee researched existing regulatory requirements and examples of the procedures being used and shared by the committee members. Hilary Thesmar and Jaime Hernandez shared compiled processes used by retailers and restaurants. This information was incorporated into the guideline draft.
- 2017 FDA Food Code & Annex
<https://www.fda.gov/downloads/food/guidanceregulation/retailfoodprotection/foodcode/ucm595140.pdf>
- FDA Guide to Minimize Food Safety Hazards of Fresh Cut Produce: Draft Guidance for Industry (October 2018)
<https://www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/UCM623718.pdf>
- EPA Antimicrobial Pesticide Registration
<https://www.epa.gov/pesticide-registration/antimicrobial-pesticide-registration>
- 21 CFR 112
<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=112>
- 21 CFR 117
<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=117>
- 21 US Code §321(r)
<https://www.law.cornell.edu/uscode/text/21/321>
- United States Federal Food, Drug, and Cosmetic Act 201(q)(1)(B)(i)
<https://legcounsel.house.gov/Comps/Federal%20Food,%20Drug,%20And%20Cosmetic%20Act.pdf>

1. *Two working groups initially created, merged into one working group due to the task overlaps.*
2. *Guideline (draft) covering handling, cleaning, and sanitation practices related to washing and crisping of produce, as well as chemicals and their use for washing and crisping. Jill Hollingsworth, Anna Starobin, Jaime Hernandez, Todd Rossow, Amanda Garvin, Erich Hess, Kris Zetterlund, Rick Barney, Janet Buffer are tasked with putting together a draft guideline, which will be reviewed by the committee. This working group has weekly conference calls and the draft document was presented to the committee members during the May meeting. Comments to the draft documents were received from the committee members and are being addressed by the working group. FDA provided comments to the washing and crisping processes covered in the table included in the guide. FDA also provided comments to the Washing Whole Fruits and Vegetables (RACs) Using Chemicals diagram. Comments provided are being addressed. As of June 12, 2019, eight (8) monthly committee meetings, via conference calls, have occurred (9/25/18, 10/23/18, 11/26/18, 12/17/18, 1/28/19, 3/25/19, 4/22/19, 5/20/19).*
4. **Charges COMPLETED and the rationale for each specific recommendation:**
 - a. None

5. Status of charges still **PENDING** and activities yet to be completed:

1. Develop a Produce Washing and Crisping Guidance document for Retail Food Establishments which includes the following:
 - a. Detail the handling, cleaning, and sanitation practices related to washing and crisping of produce.
 - b. Describe the criteria for produce crisping vs. produce washing.
 - c. Clarify the types of chemicals and their use for washing and crisping.
- ** NOTE TO THE BOARD:** PWWC committee understands the FDA will have issues with any guidance submitted with “crisping” included, since there is no FDA definition; the committee will be prepared for PWW Guidance to be in two versions, one with “crisping” included, and one without at the 2020 Meeting; unless Glenda can provide recommendations from the CFP Board seat
2. Report findings and recommendations back to the 2020 Conference for Food Protection Biennial Meeting.

COMMITTEE REQUESTED ACTION FOR EXECUTIVE BOARD: No requested action at this time

1. Approval of submitted changes to the Produce Wash Water Committee roster.
2. Requested Action: The PWW Committee is requesting direction from the Board regarding the completion of the Produce Washing and Crisping Guide and the related charges given to them by CFP Council III.

Reason: The PWW Committee is near completion of the charges given to them and would prefer to present the Guide at the CFP Biennial Meeting for debate and discussion. However, without the support of FDA, the Committee would like to know the will of the Board.

Background: FDA has conveyed to the Committee a strong position against produce washing by submersion and against all methods of crisping. This brings into question the development of Guidance for these practices, despite the charge given to the Committee by CFP. These are common and widely used practices and the purpose of the Guide is to make food establishment operators aware of potential risks and offer strategies for reducing such risks. Further, there are some points that are not clear to the Committee, such as: (a) differences between the Food Code language and the information in the Annex, especially when the Annex may not be up-to-date; (b) uncertainty over the use of practices that are neither specifically prohibited nor allowed as per the Food Code; (c) different interpretations of phrases such as “under water,” “in water,” and “with water” as used in the Food Code; and (d) acceptance by FDA of practices currently used in the regulated agribusiness industry but not condoned for use at food establishments.

3. To acknowledge the periodic status report

ATTACHMENTS:

1. Content Documents:

- a. **Committee Member Roster:** See changes noted above under “requested action” No changes to previously approved roster
 “Committee Members Template” (Excel) available at: www.foodprotect.org/work/ Committee roster to be submitted as a PDF attachment to this report.
- b. **Committee Generated Content Documents (OPTIONAL):** No draft content documents submitted at this time

2. **Supporting Attachments (OPTIONAL):** Not applicable