

Standing Committee: CFP Sanitizer Committee

Date of Report: 3/13/2009

Report prepared by: Katie Swanson and Tressa Madden, Co-Chairs

Committee Charge: to work with the FDA, EPA and other stakeholders to develop appropriate language for the Food Code addressing onsite generation of pesticides in food establishments and report back to the 2010 CFP Council III.

Committee Members: See Attached Roster

Progress Report: The following questions have served as our starting point to address the charge.

- Does the chemical produced comply with 7-204.11 Sanitizers, criteria which states that the sanitizer shall meet the requirements of 40 CFR 180.940?
- Does the unit comply the requirements of FIFRA as implemented in 40 CFR 152.500?
- Are there occupational exposure concerns that make the unit unsuitable for a retail/foodservice setting?
- Are there operational and user training issues, such as ability to adjust and maintain proper output concentrations, that make in unsuitable for retail/foodservice?
- Has the device been accepted for use in other non-retail applications? By whom?
- Does the manufacturer, the device and/or the sanitizer produced need to be EPA registered? There are FIFRA requirements that apply to the manufacturers of pesticidal devices. Also, the need for sanitizer registration depends on the nature of the sanitizer produced, by whom it is applied and whether there is intent to package/sell/distribute it.

Sub-Committees have been developed to discuss electrolyzed water, ozone and chlorine dioxide technologies. Discussions will be led by Dr. Peter Muriana for electrolyzed water, Mark Sampson for ozone, and Chlorine Dioxide will be led by Dale Grinstead. Those committee members interested have joined in the discussion with sub-committee groups to help develop language that addresses issues, concerns, and points of confusion that is appropriate to our charge.

It has been determined that the language the committee recommends to the CFP for the Food Code will address on-site generation of antimicrobials in general, rather than addressing the specifics of particular technologies (ozone, electrolyzed water, etc.) Specific technologies may be addressed in an appendix as examples, e.g. in the public health reasons section. The regulatory committee members will begin reviewing the Food Code where addressing on-site generation of antimicrobial pesticides would be relevant. The sanitizer

committee meeting will have conference call # 4 in April. See attached minutes from conference call #1, #2, and #3.

Requested Board Actions: None requested at this time.

Recommendations for future charge: None requested at this time.