

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 I-020**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

*All information above the line is for conference use only.*

---

**Issue History:**

This is a brand new Issue.

**Title:**

Add a definition for In-place cleaning (IPC)

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

In-place cleaning (IPC) is not the same as clean in place (CIP) or clean and sanitize in place (CSIP). Section 1-201.10 of the 2013 FDA Food Code has a definition for CIP. Section 4-501.112 Part (B) of the FDA Food Code makes reference to in-place cleaning (IPC) which is otherwise not defined in the code. Rather, there is a circular reference made back to CIP. Because they are different processes, IPC needs its own definition.

**Public Health Significance:**

Having clear, unambiguous definitions for food safety systems is critical to ensuring that everyone has the same idea of what is needed for reasonable safety. This is the reason that section 1-201.10 of the food code is so important and why a new definition needs to be added to the FDA Food Code to differentiate two completely separate concepts that (unfortunately) are known to use the same three words, albeit, in different order.

An *in-place cleaning* (IPC) process is a *manual* cleaning and sanitizing process that is carried out without moving the food equipment or food contact surfaces to a sink or into a dishwasher. Examples here include motorized meat slicers, band saws and grinders, whether for meat or coffee. Another example is a large cutting board or a large food display tray that does not fit into a sink or dishwasher, thus requiring IPC.

*Clean in place* (CIP) systems have integral plumbing lines for the conveyance of liquid foods. If the internal surfaces of these liquid food or beverage plumbing lines do not have access (inspection) openings to enable inspection, and access to enable manual cleaning and sanitization of its surfaces, then a sequential clean and sanitize in place (CSIP or CIP) system is required. A more accurate description of these system is a *clean and sanitize in place* systems, or CSIP (pronounced "*sea-sip*" using only two syllables as compared to three syllables for *C.I.P.*). CSIP systems are similar to IPC only in the sense that the food contact surfaces are cleaned and sanitized without moving them to the scullery or into a dish machine. CSIP systems are *plumbed* systems designed to *automatically* or *semi-*

*automatically* clean and disinfect internal food contact surfaces that are otherwise inaccessible using process validated cleaning and sanitizing protocols. Some equipment can have CSIP integrated into its design and is comprised of a series of valves, pumps and/or control logic with the sequential application of cleaning and then sanitizing solutions, and are free draining. Other CSIP systems depend upon connection to ancillary CSIP equipment that will flush throughout the (food contact surface) plumbing system of the food/beverage equipment, cleaners and sanitizers in sequence, to remove accumulated soils and/or biofilms. These systems are self-draining to carry away dislodged food soils and other contaminants along with the cleaning and sanitizing process solutions. Examples include the internal plumbing and other food contact surfaces in dispensing freezers for soft-serve ice cream, yogurt and similar equipment with inaccessible multi-use food contact surfaces in the form of internal beverage lines, fittings and valves and energy transfer surfaces. Additional examples include internal surfaces of ice machines such as its feed water lines, harvest plates and sumps, and internal and external plumbed beverage lines for food equipment that prepares, processes, packages and/or dispenses milk or milk products, juices, soda, beer, wine and spirits.

IPC comprises a PRIORITY foundation (Pf) item.

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

a letter be sent to the FDA requesting the 2013 Food Code be amended as follows (language to be added is underlined):

Section 1-201.10

"In-place cleaning" (IPC) means the manual cleaning of Food Equipment and Food Contact surfaces without moving the equipment or food contact surface to the scullery, a dish washer or sink.<sup>Pf</sup>

**Submitter Information:**

Name: Thomas Johnson  
Organization: QleanTech Enterprises, LLC  
Address: 1408 Northland Dr. #406  
City/State/Zip: Mendota Heights, MN 55120  
Telephone: 651-587-0418  
E-mail: tomj@jdpinc.com

*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.*