MEMORANDUM

TO: Technical Committee of the Council of Public Health Consultants
Bob Powitz, Steve Tackitt, J. Douglas Park

FROM: Mike Halko, TC Chair

DATE: January 24, 2008

SUBJECT: Proposed revisions to NSF/ANSI 3 – Commercial warewashing equipment
(3i6r2)

On behalf of Mr. Joel Hipp, issue proponent, Draft 2 of NSF/ANSI 3 issue 6 is being forwarded to the Technical Committee for consideration. Please review the changes proposed to this standard and submit your ballot by February 14, 2008 via the NSF Online Workspace.

Purpose

The purpose of the ballot is to add specific wording in NSF/ANSI 3 to allow a potable water, post-sanitizing rinse on commercial dishwashers.

Background

European systems often provide a clean, potable water rinse after the sanitizing step to either allow dishes to be handled with less discomfort or to remove residual sanitizer taste and odor. Since this water is potable and the dishes must be dry before use, there is no impact on public health. NSF/ANSI 3 will be modified to require the final sanitizing performance test to be completed with the post-sanitizing rinse in operation in either the hot-water or chemical sanitizing mode. This “worst case” situation should alleviate concerns that the sanitizing step would be compromised with a cold water rinse after sanitizing. An additional requirement for chemical sanitizing machines has been added for a readily accessible means to temporarily deactivate the post-sanitizing rinse. This will allow verification of the sanitizer concentration.

FDA Food Code paragraph 3-302.15 (A) states, “…raw fruits and vegetables shall be thoroughly washed in water to remove soil and other contaminants before being cut, combined with other ingredients, cooked, served, or offered for human consumption in ready-to-eat form.”

FDA Food Code paragraph 4-703.11(C)(4) states, “After being cleaned, EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be SANITIZED in chemical manual or mechanical operations, including the application of SANITIZING chemicals by immersion, manual swabbing, brushing, or pressure spraying methods, using a solution as specified under § 4-501.114 by providing an exposure time used in relationship with a combination of temperature, concentration, and PH that, when evaluated for efficacy, yields SANITIZATION as defined in Subparagraph 1-201.10(B).”

The Task Group on Ware washing met twice to discuss post-sanitizing rinses. The Task Group had the following concerns on the proposal:

1. The proposal would be in conflict with the Food Code. The Food Code requires ware to be air dried (4-501.114). However the Food Code does not specifically exclude a potable water rinse. If the ballot is successful, the CFP will need to address this.
issue. A proposal is being prepared independently for the Council for Food Protection to allow potable water rinse for commercial dishwashers tested to the sanitation performance criteria.

2. Conflict with the EPA labeling requirement. EPA’s 7-23-07 response to the Task Group’s questions includes the following statement: “the recommendation of potable water rinse after food-contact surfaces have been treated with a sanitizing rinse is not acceptable for products intended for use as a terminal sanitizing rinse”.

3. Boil water advisories indicate there could be a problem in the water distribution system but a facility may be allowed to continue to operate in many jurisdictions. Boil water notices inform facilities that a problem exists and they are prohibited to operate. Should a ware washing machine with a post-sanitizing rinse be permitted with an off switch and information included on the label in boil water advisories and notices? It should be noted that boil water advisories are outside the scope of the NSF standards since paragraph 5.12.1 states, “The final sanitizing rinse supply water shall be from a potable source….”

4. Drying time extensions for the ware. Excess space is needed for drying. There would also be excess water and moisture with a post-sanitizing rinse.

For detailed information on the above concerns, please see the meeting summaries under supporting documents.

**Public Health Impact**

There is no impact on public health.

If you have any questions about the technical content of the ballot, you may contact me in care of:

Chairperson, Technical Committee
c/o Technical Committee Secretariat, Lorna Badman
Sr. Standards Specialist
NSF International
Tel: (734) 827-6806
Fax: (734) 827-6831
E-mail at badman@nsf.org