

# ISSUE PAPER

NSF standard(s) impacted: NSF/ANSI 2, 4, 8, 18, 20, 25, 59

## Purpose and background:

NSF/ANSI Food Equipment Standards include performance tests that involve a microbial challenge suspension to be applied to food contact surfaces at a minimum density. In order to ensure all food contact surfaces are exposed to the minimum density, positive control samples should be collected at the dispense point of the equipment. The annexes of the standards have procedures for analyzing control samples but lack the specific details of where they are taken and how they are applied.

## Recommendation:

### 6.1 Cleaning and sanitization procedures

#### 6.1.1 Performance requirement

Cleaning and sanitization procedures recommended by the manufacturer shall effectively clean and sanitize food contact surfaces.

NOTE — This requirement applies to manual cleaning and sanitizing procedures and to CIP and sanitizing procedures recommended by the manufacturer.

#### 6.1.2 Test method

Microbiological methods for stock culture preparation, and enumeration / analysis *Escherichia coli* shall be performed as specified in Annex [N-1](#).

**6.1.2.1** The equipment shall be filled with the *E. coli* suspension.

**6.1.2.2** The equipment shall be operated so that food contact surfaces are exposed to the *E. coli* suspension. *E. coli* suspension shall be dispensed through the equipment, collecting three 200-mL positive control samples from the dispense point to ensure the entire food contact flow path is exposed to sufficient challenge. The average of the positive control samples shall serve as the initial inoculum density (Ni).

**6.1.2.3** The equipment shall then be cleaned in place according to the manufacturer's instructions and refilled with sterile buffered dilution water (SBDW). The SBDW shall be dispensed and five 200-mL samples shall be collected at intervals from the start of the dispensing until the unit is empty. When adequate sample volumes cannot be realized, more SBDW shall be added accordingly. The equipment shall then be operated so that food contact surfaces intended for CIP are exposed to the SBDW. Sufficient SBDW shall then be dispensed. The challenge organisms present in each sample shall be collected and enumerated using the Standard Total Coliform Membrane Filter Procedure in accordance with *Standard Methods*.<sup>5</sup>

Item #: FE-2025-08

(For NSF internal use)

# ISSUE PAPER

## 6.1.3 Acceptance criteria

For each sample, the total counts on the initial inoculum density ( $N_i$ ) of at least 1,000,000 ( $1 \times 10^6$ ) and the total counts on the colony-forming units (cfus) recovered ( $N_f$ ) shall demonstrate a reduction to or greater than 99.9999% (6 log). The log reduction,  $R$ , is calculated from the following equation:

$$R = \log_{10} (N_i / N_f) \text{ where}$$

$N_i$  = initial inoculum density (cfu/mL)

$N_f$  = the number of cfu recovered in each sample (cfu/mL)

If  $N_f < 1$ , the samples shall be considered acceptable.

APHA/AWWA/WEF, *Standard Methods for the Examination of Water and Wastewater* (hereinafter referred to as *Standard Methods*), 21st edition<sup>5</sup>

### Supplementary materials (photographs, diagrams, reports, etc.):

*If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.*

Item #: FE-2025-08

(For NSF internal use)

*I hereby grant NSF the nonexclusive, royalty free rights, including nonexclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF in which this item in this or another similar or analogous form is used.*

Name:\* Mike Kohler

Company: NSF

Telephone: (734) 913-5775 Email: kohler@nsf.org

Submission date: July 1, 2025

***Please submit to: Joint Committee Secretariat or to [standards@nsf.org](mailto:standards@nsf.org)***

*\*Type written name will suffice as signature*

Item #: FE-2025-08

(For NSF internal use)