

Q&A and Chat questions from 2.14.24

I like the food safety hi five. Is there a way for me to get a copy of it for my county?

We have posted this high five document on the AFDO event page.

Is there a link we can access the contributing factor hypothesis table? [978-1-4419-8396-1 Book OnlinePDF copy.pdf \(foodprotection.org\)](https://www.foodprotection.org/978-1-4419-8396-1_Book_OnlinePDF_copy.pdf)

So, when economics and people are antecedents, how likely is it that outbreaks at that firm will be removed? Most companies can't/ don't want to increase wages. This is a very good question and point. People and economics are weaved throughout almost every root cause for a given foodborne outbreak. In my opinion, people antecedents are most easily addressed through training and other forms of food safety communication. Training is situation-adaptable and measurable. This is helpful when determining effectiveness and documenting control measures. Changing food safety culture is more difficult to measure and requires buy-in from top-down. I feel we have made positive cultural change by partnering with the challenged firms, providing support when/where appropriate, and clearly articulating the importance of food safety attitude. The same applies to economic investments into food safety. While we rarely enforce an economic change, we have encouraged operators to view food safety as an economic investment, or another "costs of doing business" that should be part of their business plan.

FDA does its own sampling, why don't they partner with the local food inspectors to do this? It seems like it would be great training while collecting that data. I think this partnership does occur, at least with certain outbreaks. When appropriate, locals collect food samples for FDA testing. We have also collected environmental samples for USDA testing as well. Since we do not regulate environments where FDA (or USDA) may conduct routine sampling, our participation in those sampling process is highly unlikely.

Does your dept have a step-by-step procedure for food sample and swab collection? Possibly with pictures? or know of a resource that does? We currently do not have a step-by-step procedure outlined. We follow our in-class training that was adapted from the AFDO sampling training course. Outlining a JIT step-by-step sampling protocol is a great idea and something we may look into in the near future.

Is there a link for the International Association for Food Protection Procedures to Investigate Foodborne Illness - 6th Edition?

[IAFP Procedures to Investigate Foodborne Illness Revised - International Association for Food Protection](https://www.foodprotection.org/iafp-procedures-to-investigate-foodborne-illness-revised/)

What is it? Game

What about a sanitizer (not chlorine based) that has a label as NSF approved, but not EPA registered? Would that be accepted? This would be equipment that is a CIP

Does the non-approved bleach register on our test strips

If the sanitizing solution created with the product without the EPA label tested between 50-100 ppm, wouldn't that be an approved sanitizer? The main ingredient is Sodium Hypochlorite.

EPA Registered Use Summary

Section 4-501.114 of the FDA Food Code states: "A chemical sanitizer used in a sanitizing solution for a manual or mechanical operation at contact times specificized under 4-703.11(c) shall meet the criteria specified under 7-204.11 Sanitizers, Criteria, shall be used in accordance with the **EPA-registered label use instructions** and shall be used as follows:...."

Federal regulatory responsibility for chemical hard surface sanitizers was moved from the FDA to the EPA in the 1990's. Chemical hard surface sanitizers are considered pesticides since the end use is to control microbial pests such as viruses and bacteria. The EPA Office of Pesticides Program, Antimicrobial Division issues the EPA registration to bleaches which have data proving their efficacy for controlling viruses and bacteria and can be used without posing unreasonable risks to people or the environment. Those without the registration have not or can not provide this data.

The unregistered bleaches WILL still show up on the chlorine test strips because they do contain Sodium Hypochlorite. However, often they will not have the appropriate concentration percentages of Sodium Hypochlorite or may contain other chemicals which are not approved for use on food contact surfaces and therefore have not been registered or approved for use.

I reached out to Derek DeLand, Environmental Health Programs Manager, Government Affairs, at NSF to determine if an NSF approved bleach, which was not EPA registered, would still be acceptable. He explained that NSF approves their bleaches based on NSF standards which are not the same as the EPA registration standards. However, since the end use of the bleaches is the same (to control viruses and bacteria), all NSF approved bleaches should also be EPA registered unless the NSF seal is being used fraudulently.

Trompo? It looks like Trompo is the name of a cooking method for tacos specifically used in the South West part of the US and Mexico. The Trompo is still considered a vertical spit for cooking so the same food safety concerns would apply.

what is the violation in the food code if the flames are turned off during the cone cooking process and/or you see the leftover cone in the cooler? If we found an intermittent cooking process, we would mark that under FDA Food Code section 3-501.19, which is #24 on the FDA Inspection form. Due to the slow cooking and thawing process for the gyro cone, parts of the cone are kept in the temperature danger zone for extended periods of time. The intermittent cooking process then extends this time frame even more allowing the food to sit in the temperature danger zone for more than 4 hours past the time in which it was removed from temperature control. For the leftover cone, it would be dependent on temperature. If the cone does not meet the temperatures as required in the FDA Food Code, Section 3-

501.14, this is marked as a #20 on FDA inspection form. If the cone is not actively cooling (so cooling times/temperatures can not be taken) this would be marked under Section 3-501.15 and a #33 on the FDA inspection form.

Does this apply to Halal also? Halal and Kosher are similar but different. The best thing you can do is ASK QUESTIONS of the PIC or owner/operator.

Is falafel TCS before being cooked or only after? This would be greatly dependent on the recipe and processing/cooking of the food item. Always ASK QUESTIONS of the PIC or owner/operator to help make a determination. If the falafel recipe uses a canned chickpea, this is a cooked vegetable product and would be TCS before cooking. However, other ingredients such as lemon juice may reduce the acidity rendering the falafel batter non-TCS. If in doubt, consider the food to be TCS unless a product assessment or lab testing shows the pH and/or water activity to be in the non-TCS range.