

To: Heads of Environmental Health Services (England)  
Directors of Trading Standards Services (England)

18 December 2014

Dear Colleagues,

## **E. COLI O157 CONTROL OF CROSS-CONTAMINATION GUIDANCE PUBLISHED**

The Food Standards Agency (FSA) has published a revised version of the E. coli O157 Control of Cross-contamination Guidance today following consideration of the comments received through the review period which ended on 29 August 2014. This new version (available at: <http://www.food.gov.uk/business-industry/guidancenotes/hygguid/ecoliguide>) should be used by local authorities and all subsequent versions are now obsolete.

I would like to take this opportunity to thank everyone who contributed to the online survey and those who sent in detailed comments. We have tried to incorporate comments where we considered it appropriate, whilst keeping the guidance as simple as possible. The majority of respondents considered the key messages and what is required of a food business to be clear in the revised guidance, with most believing it is easier to understand and follow.

We have also published a four page factsheet for caterers which reflect the key messages in the guidance in a clear and simple format (located at the above link).

### **Comments received**

The majority of comments received sought clarification on certain areas of the guidance and we have dealt with these matters in the revised guidance. These points of clarification (listed in Annex 1) do not fundamentally change the principles of the guidance and are as follows:

1. Separation: To clarify that the controls implemented by a food business should be appropriate to the activities of the business, what is achievable, and the risk posed.

Physical separation may not be possible or may not be required for every business and alternative approaches may be appropriate. For example a business could adopt time-separation and use the same area for both raw

food preparation and ready-to-eat (RTE) preparation as long as effective cleaning and disinfection is possible between those tasks. However, if an inspecting officer does not have confidence in the business' systems or believes time separation is not being undertaken safely, then physical separation should be recommended.

Some respondents questioned this approach, believing that physical separation is the only reliable means of safety. The FSA does not support this view and considers that alternative controls, such as time separation, can be safe if managed correctly. The caterer's factsheet explains the controls we consider appropriate, but these will need to be considered for each individual business, including the confidence the officer has in the business to implement such controls.

## 2. Adequate disinfection: To clarify that:

Vacuum packers, slicers and mincers should not be dual used, unless they can be dismantled and fully disinfected between uses. Given that this practice is complicated it is not perceived that this could occur during the normal operations of the day. All possible food contact points need to be accessed for disinfection. Furthermore, for vacuum packers the dismantling process needs to be undertaken by a competent individual given the complexity of the machine. The form of disinfection can either be heat or chemical (appropriate chemical concentration and contact time should be considered).

Other types of complex equipment, such as temperature probes, weighing scales, and some mixers may be dual used if the business has evaluated a safe procedure for cleaning and disinfection between uses (outlined in the guidance). For these items chemical disinfection is allowed, as it is often impractical to use heat/dishwasher disinfection and the business should have assessed the risk of dual use and appropriate disinfection.

Utensils (including chopping boards) should not be dual used for both raw or RTE products, unless they are put through a dishwasher between uses. We do not consider that many businesses will find this difficult as the use of separate dedicated utensils is embedded in general industry practice. If a business does wish to dual use utensils, the use of a dishwasher removes the risk of any procedural control breakdown that might otherwise occur with other forms of cleaning and disinfection. If a business wishes to use alternative procedures for cleaning and disinfecting dual use utensils to those outlined in the guidance, for example chemical disinfection, it would need to

demonstrate that it has appropriate controls in place to control the risk of cross-contamination.

3. Dishwasher temperature: To clarify that there is no requirement to take temperature readings of dishwashers unless you have reason to consider that a dishwasher is ineffective. Most commercial dishwashers will run a wash tank temperature of around 60°C, and the final rinse will normally be around 80°C. However, due to the short cycle the items being washed will rarely reach these temperatures. It is the internal motion of the dishwasher, rather than the temperature reached, that has been shown to remove foodborne pathogens and effectively make washed equipment safe for use. The FSA advice is that for dishwashers to be effective, both domestic and commercial, they need to be properly maintained, routinely serviced and the cycle should not be interrupted once it has started. Businesses should follow the manufacturer's instructions of use which include among other things, instructions on the removal of food particles prior to loading, correct loading (i.e. avoid overloading), pre-rinsing equipment and utensils, removal of limescale from water jets, filters and drains, appropriate use of chemicals (detergents) and regular cleaning of the machine.

It is therefore important to assess whether the dishwasher is being regularly cleaned and serviced, and is being used in accordance with the instructions for the machine. If there is evidence that a dishwasher is not working correctly, the officer should ask for it to be serviced or for the business to put in place suitable alternative controls (for example the use of separate dedicated utensils).

### **Guidelines for re-commissioning vacuum packers**

The FSA has also produced guidelines on what we would expect a business to consider when re-commissioning a vacuum packer. We recommend that a competent individual with specialist knowledge and skills should undertake this process in order to ensure that the machine is fit for purpose. These guidelines can also be found at the above link.

### **Workshops**

The FSA plans to run eight workshops for local authority officers in England on the revised guidance, from February to March 2015. These workshops will include Industry representatives who will share and discuss the challenges they face, and

will provide an opportunity for open dialogue by all parties on the implementation of the guidance. We will send details about these workshops through a future enforcement mail out.

We will keep the guidance under review to make sure that it is in line with the latest available evidence and is practical for business and enforcement officers. As such we would welcome feedback from LAs about the application of the guidance and we will also consider any new information gained from the planned local authority workshops.

Yours sincerely,



Marc Wormald

CoP and Guidance Team

Annex 1: List of changes in the December 2014 guidance compared to the July 2014 version

LOCATION	JULY 2014 TEXT	DECEMBER 2014 TEXT
Page 2: Summary: Purpose and how to use this guidance	<b>A local authority</b> should undertake a risk assessment of the business on site to assess the suitability of the controls considered appropriate by the business to minimise the risk of cross-contamination and ensure food safety.	<b>A local authority</b> should ensure that food business operators have adequate controls in place to reduce the risk of cross-contamination and ensure the safe production of food.  <i>[Rationale – to clarify the LA officers role]</i>
Page 2: Summary: Purpose and how to use this guidance	Local authorities will have due regard to the Regulator's Code when determining the control measures in place.	Where appropriate local authorities will have due regard to the Regulator's Code when determining the control measures in place.  <i>[Rationale – Regulators codes does not include Scotland]</i>
Page 2: Summary: Structure of the guidance and legal status	Column 2: ...and for the relevant local authority to verify the suitability of the controls	Column 2: ...and for the relevant local authority to assess the suitability of the controls
Page 6: 1.2 What is cross-contamination	...It happens when harmful bacteria are spread onto food from either other food sources (known as direct cross-contamination) or...	...It happens when harmful bacteria are spread onto food from either other food sources, such as raw meat or soiled vegetables (known

		as direct cross-contamination) or ...
Page 7: 1.4 Sources of E. coli O157 in food	Raw meat - ... deer... Species.	Replaced with 'venison' and 'meat' respectively.
Page 8:	The design of any food premises...	The design of all food businesses...
Page 10: Advice on good practice: 2.2 Food preparation rooms / areas:	separate equipment, separate utensils,	separate designated equipment, separate designated utensils,
Page 11: Guide to compliance: 2.3 Storage and display	Door handles can be a potential source of cross-contamination. In practice, one way to control this is that staff handling raw foods wash their hands before touching door handles, this will keep handles clean for staff handling RTE foods.	Door handles can be a potential source of cross-contamination, and should be included on cleaning checklists/schedules.  <i>[Rationale – to add clarity to what is required and what is best practice]</i>
Page 11: Advice on good practice: 2.3 Storage and display	Door handles should be included on cleaning checklists/schedules.	One way to control the potential risk of cross-contamination from door handles is to get staff that handle raw foods to wash their hands before touching door handles.  <i>[Rationale – to add clarity to what is required and what is best practice]</i>
Page 11: Guide to compliance: 2.4 Equipment and utensils	If equipment and utensils (for example chopping boards, containers, tongs) are to be used for raw and RTE foods, they	If equipment and utensils (for example chopping boards, containers, tongs) are to be used for raw and RTE foods, they

	<p>must be disinfected by heat or an adequate dishwasher cycle between uses (see <b>Section 3: Cleaning and disinfection</b>).</p> <p>If heat disinfection is not possible, separate equipment and utensils must be used for handling raw and RTE foods and must be stored and washed separately.</p>	<p>should be disinfected by heat or an adequate dishwasher cycle between uses (see <b>Section 3: Cleaning and disinfection</b>).</p> <p>If heat disinfection or a dishwasher is not possible, separate equipment and utensils should be used for handling raw and RTE foods and must be stored and washed separately.</p> <p><i>[Rationale – we strongly recommend separate utensils or dishwasher/heat disinfection, but alternatives can be appropriate if implemented correctly]</i></p>
Page 11: Advice on good practice: 2.4 Equipment and utensils	Designated equipment and utensils used for raw and RTE foods should be easily identifiable for example colour coded.	It is strongly recommended that businesses have dedicated separate equipment and utensils for raw and RTE foods and these should be easily identifiable for example colour coded.
Page 12 Guide to compliance: 2.5 Complex Equipment		<i>[Text inserted]</i> : Chemical disinfection as outlined in section 3.2 is allowed for these items.
Page 12 Guide to compliance: 2.5 Complex Equipment	<i>[Text deleted as this is mentioned at the start of the document]</i> : The LA will need to determine whether the controls in place are adequate to ensure the safety of food.	

Page 16 Guide to compliance: 3.1 Heat Disinfection	If the same utensils and equipment are used for both raw and RTE foods at separate times, they <i>must</i> be heat disinfected or put through <i>the</i> adequate dishwasher cycle between uses.	If the same utensils and equipment are used for both raw and RTE foods at separate times, they <i>should</i> be heat disinfected or put through <i>an</i> adequate dishwasher cycle between uses.  <i>[Rationale – although we strongly recommend use of heat/dishwasher disinfection, alternatives are allowed]</i>
Page 16 Guide to compliance: 3.1 Heat Disinfection	Any method of heat disinfection is acceptable provided that the process removes E. coli O157 from all surfaces; for example a dishwasher, a sterilising sink, or a steam cleaner.	Any method of heat disinfection is acceptable provided that the process removes E. coli O157 from all surfaces; for example a sterilising sink or a steam cleaner.  <i>[Rationale – dishwasher did not sit well within this sentence, as dependent on machine may not be heat disinfection as explained above]</i>
Page 16 Guide to compliance: 3.1 Heat Disinfection	If heat disinfection is not available, food contact surfaces, equipment and utensils cannot be shared and need to be specifically designated for either raw or for RTE foods only (see Section 2: Separation).	If heat disinfection or a dishwasher is not available, equipment and utensils should not be shared and as such be specifically designated for either raw or for RTE foods only (see Section 2: Separation).
Page 16 Advice on good practice: 3.1 Heat Disinfection	Where heat is not available it is good practice to use separate sinks to wash	Where heat or a dishwasher is not available it is good practice to use



	equipment and utensils designated for raw and RTE foods.	separate designated sinks to wash equipment and utensils.
Page 16 Guide to compliance: 3.2 Chemical Disinfection	This involves the physical removal of visible dirt, food particles and debris from surfaces...	This involves the physical removal of visible dirt and food particles from surfaces...
Page 21 Guide to compliance: 4.2 Protective clothing	When the same staff handle raw and RTE food alternately (for example during cooking, or in a shop with only one member of staff) there is no need to change protective clothing for different activities but care is required to ensure that clothing does not become contaminated, or pose a risk of cross-contamination in which case it will need to be changed.	When the same staff handle raw and RTE food alternately (for example during cooking) there is no need to change protective clothing for different activities but care must be taken to ensure that clothing does not become contaminated, or pose a risk of cross-contamination otherwise it will need to be changed.
Glossary	Cross-contamination definition updated to reflect the same wording used in guidance. Infective dose definition removed as wording not in guidance.	