

Food Contact Surfaces Policy

Perhaps you have been running restaurants for twenty years. Or maybe you just graduated from a prestigious culinary school. You know what you're doing. So why did you still get a food contact surfaces violation?

Maybe it's time to create a food contact surfaces policy, so you can ensure that your employees know when to wash equipment, how to wash equipment, and what to do if something isn't right.

First of all, what is a policy and how do you create a food contact surfaces policy for your food establishment?

A policy is a defined set of actions that minimize food safety risks. Although some small food establishments may have verbal policies, it is best to write your policies down.

Here are the key steps to consider when developing any policy:

- **Include the key people at the table**
- **Identify the most important steps in your processes**
- **Ensure that your policy includes corrective actions**
- **Revise the policy based on problems that arise, or as your food processes change**

Let's look at each of these steps more closely.

When writing your policy, make sure you are including the key people in your establishment, and also consider which staff members may be involved in each step.

Here are common operations in a kitchen. Where could a food contact surfaces issue arise in each of these steps?

Preparation

Review the flow of food preparation in your establishment. Consider which pieces of equipment, such as cutting boards, utensils, and pans will come





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into contact with food. Defining this will ultimately determine use requirements as it relates to these pieces of equipment.

Cleaning

Review warewashing procedures in your establishment. Is your warewashing equipment sufficient to meet the demand? Is it in good working condition? Clean hands must be used to handle clean dishware. This may require specific procedures to eliminate the cross contamination of dishware by staff who are handling soiled dishware as part of the warewashing process.

Service to Customers

The delivery of food to your customers is the final step where contamination can occur. Staff will be touching the food contact surfaces while they serve the food to customers. Review these procedures to minimize this contact and ensure that all equipment is clean prior to use with food.

Ask these questions for each of these operations:

Who is responsible?

Who prepares, assembles, and serves food? Who cleans dishware? Who oversees these processes? Who is responsible for execution?

What needs to happen?

Employees shall properly wash, rinse, and sanitize all food contact surfaces using the 3-compartment sink. Or employees shall operate the dishmachine according to manufacturer's instructions and ensure it is functioning properly, which includes temperatures and sanitizer levels. Employees will ensure the wiping cloth buckets contain clean water with the correct sanitizer levels.

When does it take place?

Food contact surfaces used for food preparation will be washed, rinsed, and sanitized at least every 4 hours.

Where does it occur?

Food employees will clean and sanitize all food service equipment at the 3-compartment sink or at the dishmachine. Clean-in-place equipment will be cleaned and sanitized at the equipment. Equipment will be stored and moved in a way to minimize contamination of clean food equipment.



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How is this achieved?

Food employees shall fill the wash compartment with warm water and detergent, the rinse compartment with warm water, and the sanitizer compartment with cool sanitizer solution. Employees will properly fill the dish-machine and ensure all water temperatures have been achieved prior to placing food equipment in the unit. Employees will use test strips to measure the sanitizer levels to ensure they are at the proper levels (chlorine: 50-100ppm; quat: per manufacturer's instructions). Employees will set food equipment aside to properly drain and air dry prior to placing equipment back into storage or production.

As you review these key operational steps, consider whether it would make sense in your business model to write several policies for food contact surfaces. For example, you might write separate policies for manual warewashing (e.g. 3-compartment sink), mechanical warewashing (dish-machine), and wiping cloth buckets and use.

Now for the corrective actions. This is the "what if..." step. What if something goes wrong? Your policy should state what actions are taken if cleaning procedures are not followed. You can include a space for writing in corrective actions on your logs.

But don't stop here! Your food contact surfaces policy is a living document, and will change over time. When you discover areas of non-compliance in your establishment, use them as opportunities to improve, and return to your policy to incorporate the changes. In this way, you will continue to improve.

To summarize, here are the key steps to consider with any policy:

- **Include the key people at the table**
- **Identify the most important steps in your processes**
- **Check that your policy answers the questions: who, what, when, where, why and how**
- **Ensure that your policy includes corrective actions**
- **Revise the policy based on problems that arise, or as your food processes change**

Remember, if you don't train your employees on your food contact surfaces policy, it won't do much to help your establishment. Check out the next document, a Manager's Guide to training your employees.