

**Interpretation Number: 09-XI-02-101**

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**National Shellfish Sanitation Program  
U.S. Food and Drug Administration  
Shellfish Safety Team  
Division of Cooperative Programs  
Office of Compliance  
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**Model Ordinance** Chapter XI. 02. B. (1)

**Reference:** Chapter XI. 02. B. (2)

**Key Words:** Food contact surfaces, cleaning, sanitizing, equipment construction

**Question:** 1) What is a **food contact surface**?

2) What constitutes effective cleaning and sanitizing of a food contact surface?

3) What constitutes acceptable construction of shellstock grinders and parts thereof are considered food contact surfaces?

**Interpretation:**

1) A **food contact surface** means a surface of equipment or a utensil with which food normally comes into contact; or a surface of equipment or a utensil from which food or liquid may drain, drip, or splash into a food; or onto a surface normally in contact with food. Food contact surfaces include, but are not limited to, equipment and utensils such as; shucking knives and handles, shucking hammers and handles, shucking blocks, ice scoops and shovels, ice bins, skimmers, blower tanks, shucking pails, shellstock grinders.

2) Food-contact surface shall be clean to sight and touch. Cleaning and sanitizing shall occur prior to use each day and any time during use when contamination may have occurred. At a minimum, food contact surfaces shall be cleaned and sanitized every four hours. More frequent cleaning may be necessary depending on the characteristics of the equipment and its use and the amount of food residue accumulation. At the end of each day, food contact equipment and utensils shall be washed and rinsed.

Food contact surfaces shall be effectively washed to remove or completely loosen soils by manual or mechanical means such as the application of detergents; hot water; brushes; or high pressure sprays. If washing in sink compartments is impractical such as when equipment is fixed or utensils are too large, washing shall be done using an alternative manual procedure. In such instances, washing shall be facilitated by 1) disassembling equipment as necessary to allow access of the detergent solution to all parts and equipment components and 2) utensils shall be scraped or rough cleaned to remove food particle accumulation.

The cleaning of food contact surfaces shall occur prior to sanitizing in order for the sanitizer to be effective in destroying vegetative bacteria. Sanitizers may be applied by immersion, spraying or

brushing. Sanitizer concentration shall be in accordance with the manufacturer's directions on the label.

3) Parts of a shellstock grinder which are considered food contact surfaces include; the blade, the area behind the blade including the motor shaft from the blade to the motor housing, and the inside surface of the housing or cover surrounding the blade. These food contact parts shall be manufactured from high impact materials that are easily cleanable and non-corrosive. The grinder must be constructed to be easily disassembled and assembled to facilitate inspection, maintenance, cleaning, and sanitizing.

Guidelines for grinder construction:

1. The motor shaft should be of corrosion resistant material.
2. Juncture point where the motor shaft enters the blade chamber must be sealed to reduce dirt and detritus deposition around the shaft.
3. The blade must be made from a single piece of high impact non-corrosive material. Blade teeth must be an integral part of the blade, or if grinding surfaces are used instead of teeth, they must be welded to the face of the blade with all welds ground smooth.
4. The housing around the blade assembly must be constructed of material that is corrosion resistant.
5. Bolts or screws must be constructed of corrosion resistant material to prevent rust and corrosion.
6. The inside surface of the blade housing must be smooth, and if welded ground smooth for easy cleaning.
7. The blade housing must be designed with an easily removable cover that will open up the **entire blade assembly area** to facilitate inspection, cleaning, sanitizing, and maintenance.

**Rationale:**

Each shellfish dealer is responsible for assuring that all food contact equipment and utensils meet the design, construction, repair, and cleaning requirements of the NSSP, Guide for the Control of Molluscan Shellfish. Food contact surfaces must be cleaned and sanitized at a minimum frequency and in accordance with proper procedures to prevent contamination of shellfish by microbial pathogens and chemicals. Consistent with the FDA Food Code, cleaning and sanitizing shall occur at least every four hours and where necessary more often, depending on the accumulation of food debris or exposure to other contaminants. Under the NSSP Guide for the Control of Molluscan Shellfish and 21 CFR, Part 123, shellfish dealers are responsible for monitoring and maintaining records of the cleaning and sanitizing of food contact surfaces.

**Other References:**

1. 21 Code of Federal Regulations, Part 110 - Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food, U.S. Food and Drug Administration.
2. 21 Code of Federal Regulations, Part 123 - Fish and Fishery Products, U.S. Food and Drug Administration.
3. 1997 Food Code, U.S. Food and Drug Administration.
4. Food Equipment American National Standard NSF International Standard ANSI/NSF, NSF International, Ann Arbor, MI, 48113.

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