



# DATE MARKING - Key Changes

Tuesday, August 30 1 • 9:00-10:00am

# Focus: Date Marking

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- **What is Date Marking?**
  - General product dating guidelines and requirements
  - Public Health Rationale – Why is date marking required?
  - What methods can be used?
- **Determining Foods Requiring Date Marking**
  - Food must meet five criteria
  - Which foods are exempt
- **Verifying Control**
  - Training food workers and inspectors
  - Correction and enforcement

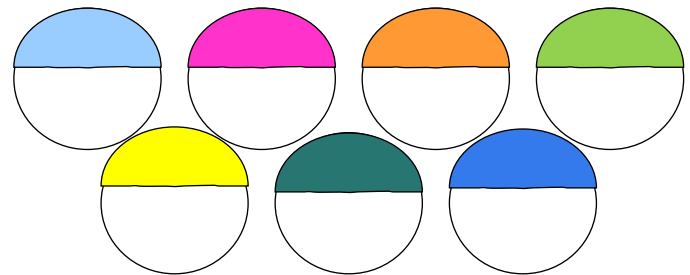
# Date Marking: WAC 246-215-03426

## What is it?

- Back-of-house dating system to ensure proper stock rotation in the food establishment; not designed for customer awareness
- Cold, RTE, Time/Temperature Control for Safety Foods that are prepared on-site or unpackaged and held for more than 24 hours must be marked for a 7-day service or discard.

- Examples:

- Opened containers of milk
- Opened cream cheese containers
- House-made pasta salad
- Watermelon sliced in-house



# The Goal

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- Limit the *growth* of *Listeria monocytogenes* (*Lm*)

# Date Marking Methods

- Any method such as marking calendar dates, days of the week, color-coding may be used
  - Method must be able to be explained to the regulatory authority
- Either the **day** or **date of preparation** or **service** may be used to identify when a food must be served or discarded
  - Day 1 = Day of preparation or opening
  - Procedure is not required to be written
  - Staff must be trained and use a consistent system
- Freezing pauses the calendar, but doesn't reset it (add freeze date to label)

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	<b>1</b> <sup>4</sup>	<b>2</b> <sup>5</sup>	<b>3</b> <sup>6</sup>	<b>4</b> <sup>7</sup>
<b>5</b> <sup>8</sup>	<b>6</b> <sup>9</sup>	<b>7</b> <sup>10</sup>	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	<b>1</b> <sup>4</sup>	<b>2</b> <sup>5</sup>	<b>3</b> <sup>6</sup>	<b>4</b> <sup>7</sup>
<i>Product in freezer</i> <sup>8-14</sup>						
<b>5</b> <sup>15</sup>	<b>6</b> <sup>16</sup>	<b>7</b> <sup>17</sup>	18	19	20	21
22	23	24	25	26	27	28

# Date Marking Criteria

- All food should follow 'first in – first out'
- Only foods that meet all **5** criteria must be date marked

1

Is the food **unpackaged**, prepared in-house, or in an opened commercial container?

- Foods in commercially-sealed packages should not have exposure to *Listeria* in the retail environment



2

Is the food **TCS and refrigerated**?

- Date Marking only applies to cold, time-temperature control for safety foods



3

Is the food **Ready-to-Eat**?

- Foods that will be cooked or raw produce that will be washed are not RTE



4

Is the food kept refrigerated **more than 24 hours**?

- *Listeria* is a risk for foods stored extended periods



5

Is the food **NOT exempt**?

- Foods at low risk for *Listeria monocytogenes* are not required to be date marked

# RTE, Cold TCS Foods **Exempt** from Date Marking

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- Deli salads prepared and packaged in a **food processing plant**
- USDA-regulated, **shelf-stable fermented sausages & salt-cured meats**
  - Dry Salami
  - Pepperoni
  - Prosciutto
- **Shellstock**
- **ROPed/Packaged Food**

# RTE, Cold TCS Foods Exempt from Date Marking

## ● Hard and semi-soft cheeses

- Use Annex 3 list

## ● Cultured Dairy Products

- Buttermilk
- Yogurt
- Sour cream

## ● Preserved Fish Products

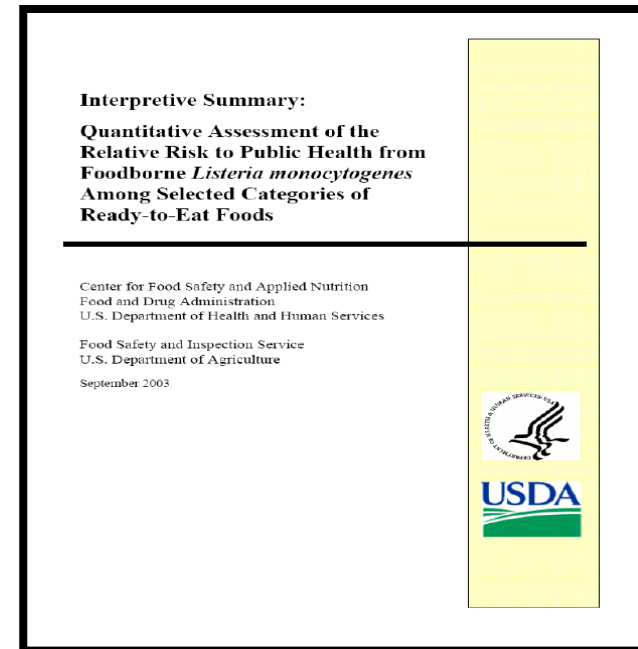
- Pickled Herring
- Dried or salted Cod
- *Note: This does not include smoked fish like lox*

List of Hard Cheeses Exempt from Date Marking	List of Semi-Soft Cheeses Exempt from Date Marking
Asadero	Asiago soft
Abertam	Battelmatt
Appenzeller	Bellelay (blue veined)
Asiago medium or old	Blue
Bra	Brick
Cheddar	Camosum
Christalinna	Chantelle
Colby	Edam
Cotija Anejo	Fontina
Cotija	Gorgonzola (blue veined)
Coon	Gouda
Derby	Havarti
Emmentaler	Konigskase
English Dairy	Limburger
Gex (blue veined)	Milano
Gloucester	Manchego
Gjetost	Monterey
Gruyere	Muenster
Herve	Oka
Lapland	Port du Salut
Lorraine	Provolone
Oaxaca	Queso de Bola
Parmesan	Queso de la Tierra
Pecorino	Robbiole
Queso Anejo	Roquefort (blue veined)
Queso Chihuahua	Samsoe
Queso de Prensa	Tilsiter
Romanello	Trappist
Romano	
Reggiano	
Sapsago	
Sassenage (blue veined)	
Stilton (blue veined)	
Swiss	
Tignard (blue veined)	
Vize	
Wensleydale (blue veined)	



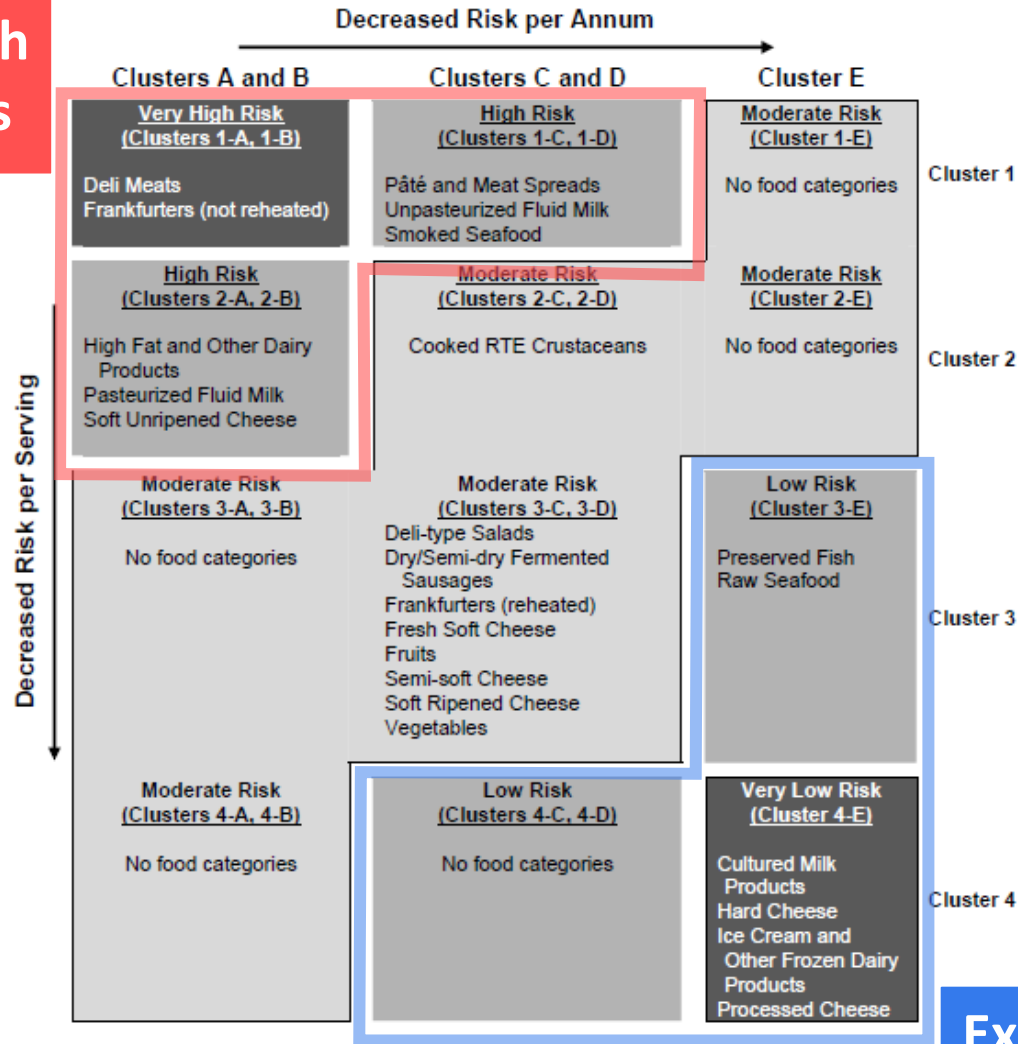
# FDA/USDA/CDC *Lm* Risk Assessment

- Used 5 factors to measure health impact of LM
- Ranked 23 food categories
  - Very High
  - High
  - Moderate
  - Low
  - Very Low
- Download as a PDF
  - [www.fda.gov/media/77947/download](http://www.fda.gov/media/77947/download)



# Impact of *Lm* Risk Assessment

Focus on Very High & High Risk foods



Summary Figure 1. Two-Dimensional Matrix of Food Categories Based on Cluster Analysis of Predicted per Serving and per Annum Relative Rankings

Exempt Low & Very Low Risk foods

# Impact of *Lm* Risk Assessment

Focus on Very High  
& High Risk foods

Decreased Risk per Annum

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## Clusters A and B

Very High Risk  
(Clusters 1-A, 1-B)

Deli Meats  
Frankfurters (not reheated)

High Risk  
(Clusters 2-A, 2-B)

High Fat and Other Dairy  
Products  
Pasteurized Fluid Milk  
Soft Unripened Cheese

## Clusters C and D

High Risk  
(Clusters 1-C, 1-D)

Pâté and Meat Spreads  
Unpasteurized Fluid Milk  
Smoked Seafood

# Date Marking: Compliance is A Mix of Red & Blue

- Applicable foods must be correctly date marked
- Foods at **high risk for *Listeria monocytogenes*** will be considered a red critical and require immediate correction
  - Reheating of foods traditionally served cold is acceptable remediation (except in HSP facilities)

MEALS OBSERVED		B	L	D	C	O	INSPECTION	Investigation	Other	Temporary	Complainant		
DATE	TIME IN	ELAPSED TIME		TOTAL POINTS	RED POINTS	REPEAT RED	PHONE						
<b>RED HIGH RISK FACTORS</b>													
High Risk Factors are improper practices or procedures identified as the most prevalent contributing factors of foodborne illness or injury. Circles indicate compliance status (IN, OUT, N/O, N/A) for each item.													
IN = In Compliance    OUT = Not In Compliance    N/O = Not Observed    N/A = Not Applicable    CDI = Corrected During Inspection    R = Repeat Violation													
#	Compliance Status	DDI	R	PTS	#	Compliance Status	DDI	R	PTS				
<b>Demonstration of Knowledge</b>													
1	IN OUT			5	16	IN OUT N/A N/O			25	Time/Temperature Control for Safe Food			
PIC present, demonstrates knowledge and performs duties to maintain AMC. Certified manager on staff unless exempt.													
Food Worker Cards current for all food workers; new food workers trained													
<b>Employee Health</b>													
3	IN OUT			25	17	IN OUT N/A N/O			25	Proper hot holding temperatures (5 pts if 130°F to 134°F)			
Proper ill worker and conditional employee practices; no ill workers present; proper reporting of illness													
<b>Preventing Contamination by Hands</b>													
4	IN OUT N/O			25	18	IN OUT N/A N/O			25	Proper cooking time and temperature; proper use of non-continuous cooking			
Hands washed as required													
5	IN OUT N/A N/O			25	19	IN OUT N/A N/O			25	No room temperature storage; proper use of time as a control			
Proper barriers used to prevent bare hand contact with ready-to-eat foods													
6	IN OUT			10	20	IN OUT N/A N/O			15	Proper reheating procedures for hot holding			
Adequate handwashing facilities													
<b>Approved Source, Wholesome, Not Adulterated</b>													
7	IN OUT			15	21	IN OUT N/A N/O			10	Proper cold holding temperatures (5 pts if 42°F to 45°F)			
Food obtained from approved source													
8	IN OUT			10	22	IN OUT N/A			5	Accurate thermometer provided and used to evaluate temperature of TCS foods			
Water supply, ice from approved source													
9	IN OUT N/A N/O			10	<b>Consumer Advisory</b>								
Proper washing of fruits and vegetables													
10	IN OUT			10	23	IN OUT N/A			5	Proper consumer advisory posted for raw or undercooked foods			
Food in good condition, safe, and ready to eat													
<b>Highly Susceptible Populations</b>													
11	IN OUT			10	24	IN OUT N/A			10	Pasteurized foods used as required; prohibited foods not offered			
Proper disposition of returned, unsafe, or contaminated food; proper date marking procedures for food at high risk for <i>Listeria</i>													
<b>Chemical</b>													
12	IN OUT N/A N/O			5	25	IN OUT			10	Toxic substances properly identified, stored, used			
Proper sanitization, with minimum 100 ppm; parasite destruction procedures for fish													
<b>Conformance with Approved Procedures</b>													
13	IN OUT N/A N/O			15	26	IN OUT			10	Compliance with valid permit, operating and risk control plans, and required written procedures			
Food contact surfaces cleaned and sanitized; no cross contamination													
14	IN OUT N/A N/O			5	27	IN OUT N/A			10	Compliance with variance/specialized process/HACCP plan			
Raw meats below or away from ready-to-eat food; species separated													
15	IN OUT N/A N/O			5	<b>Red Points</b>								
Proper preparation of raw shell eggs													
<b>BLUE LOW RISK FACTORS</b>													
Low Risk Factors are preventive measures to control the addition of pathogens, chemicals, and physical objects into foods. Circled points indicate items not in compliance.													
Food Temperature Control				DDI	R	PTS	Utensils and Equipment				DDI	R	PTS
28	Food received at proper temperature					5	Food and nonfood surfaces properly used and constructed; cleanable						5
29	Adequate equipment for temperature control					5	Warewashing facilities properly installed, maintained, used; test strips available and used						5
30	Proper thawing methods used					3	Food-contact surfaces maintained, cleaned, sanitized						5
<b>Food Identification</b>													
31	Food properly labeled; proper date marking labels					5	Nonfood-contact surfaces maintained and clean						3
<b>Physical Facilities</b>													
32	Insects, rodents, animals not present; entrance controlled					5	Plumbing properly sized, installed, and maintained; proper backflow devices, indirect drains, no cross-connections						5
33	Potential food contamination prevented during delivery, preparation, storage, display					5	Sewage, wastewater properly disposed						5
34	Wiping cloths properly used, stored; proper sanitizer					5	Toilet facilities properly constructed, supplied, cleaned						3
35	Employee cleanliness and hygiene					3	Garbage, refuse properly disposed; facilities maintained						3
36	Proper eating, tasting, drinking, or tobacco use					3	Physical facilities properly installed, maintained, cleaned; unnecessary persons excluded from establishment						2
<b>Proper Use of Utensils</b>													
37	In-use utensils properly stored					3	Adequate ventilation, lighting, designated areas used						2
38	Utensils, equipment, linens properly stored, used, handled					3	Posting of permit; mobile establishment name easily visible						2
39	Single-use and single-service articles properly stored, used					3	<b>Blue Points</b>						
Use the following blank lines to write comments.													

# Potential Remediation Strategies

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- Potential Remediation Strategies are allowed
  - Correction of incorrect marked dates *with verification*
  - Reheating, the “Fountain of Youth”

# To Mark or Not to Mark?

**Date Mark  
If opened/prepared**

**Date Mark  
Not Required**

Milk (animal, nut, soy)

Buttermilk

Deli meats

Shelf-stable Pepperoni, Salami

Soft cheese –  
brie, feta, mozzarella

Hard & semi-soft cheese –  
cheddar, Colby, gouda, swiss, parmesan,  
processed slices

Cottage, Cream, Ricotta

Yogurt, Sour Cream

**Cut** melons, tomatoes, leafy greens

**Whole** melons, tomatoes, heads of lettuce

Hard boiled eggs

Raw shell eggs

Sushi-grade fresh salmon

Oysters in-shell

# Reduction Methods

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- Implement methods for reducing Listeria in food establishments
  - Ensure equipment cleaning every 4 hours
  - Ensure cleanliness of equipment before use with RTE foods
  - USDA Listeria Handouts available

# Food Safety Focus

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- Cold TCS foods (except those exempted) served cold must be used within 7 days of refrigerated life
- It's not enough to say “we use it faster than a week” – active control requires monitoring and tracking with date marking
- Refrigerated units with foods difficult to mark (such as soft-serve ice cream, milk dispensers, salad bars) must have an approved date marking plan or remove product daily
- Initial field correction is to ensure correct date marking procedures through education, except for foods considered high and very-high risk for *Listeria* which will require discard or reheating



# Thank you

## Website

[www.doh.wa.gov/foodrules](http://www.doh.wa.gov/foodrules)



## Email

[food.safety@doh.wa.gov](mailto:food.safety@doh.wa.gov)



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