



Cold-Brew Coffee

Safety Concerns:

1. Temperature abuse allowing for increased microbial growth;
2. Extended shelf-life increases risk of microbial growth;
3. Sanitation concerns

Things to Know:

1. Cold brewed coffee is regarded as a time/temperature control for safety (TCS) food unless evidence is provided to the Department to indicate it is a non-TCS food (see full definition of TCS in the 2013 FDA Food Code):
 - A food that because of its pH or A_w (water activity) value, or interaction of A_w and pH values, is designated as a non-TCS food.
 - If the interaction of the product's pH and A_w indicates a product assessment is required a challenge study will need to be conducted in accordance with National Advisory Committee on Microbiological Criteria for Foods (NACMCF) standards and provided to the Department for consideration.
2. HACCP plans and variances are NOT required if cold brew coffee is handled in accordance with all applicable parameters of the food code:
 - Brew, hold, and dispense at 41°F or below
 - Date marked for no more than 7 days from the date of production
3. Kegging cold brew coffee, or using a similar packaging method, such as bottling, is a reduced oxygen packaging (ROP) process. With the exceptions identified below, a HACCP plan and a variance may be required.
4. HACCP plans and variances are NOT required for non-TCS food (see #1 above).
5. HACCP plans and variances are NOT required if sealing the product using ROP methods and holding the product in package for **less than** 48 hours (after 48 hours product must be discarded, removed from package or unsealed) in accordance with §3-502.12 (F) and if handled in accordance with all other applicable parameters of the food code.
Note: Contact your inspector if clarification is needed prior to implementing ROP.
6. When packaging (packaged at 41°F or below) is conducted in accordance with §3-502.12, only a HACCP plan will be required. If processes deviate from §3-502.12, a variance will also be required.

*****Any deviation for conducting ROP from §3-502.12 would require a variance.*****

HACCP/Variance Program

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Definitions: Reduced Oxygen Packaging (ROP) means the reduction of the amount of oxygen in a package by removing oxygen; displacing oxygen and replacing it with another gas or combination of gases; or otherwise controlling the oxygen content to a level below that normally found in the atmosphere (approximately 21% at sea level).

2013 FDA Code References:

3-502.11 (D) Variance Requirement
3-502.12 Reduced Oxygen Packaging Without a Variance, Criteria.



Establishments seeking approval for a HACCP plan or variance shall submit the following to the Department for review:

1. Complete application : <https://www.maricopa.gov/DocumentCenter/View/5805/HACCPVariance-Application-PDF>
2. Application Fees
3. Detailed food preparation process
4. Complete Hazard Analysis and Critical Control Point (HACCP) Plan

For guidance please refer to:

<https://www.maricopa.gov/DocumentCenter/View/29747/HACCPVariance-Guidance-PDF>

<https://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm>

5. Standard operating procedures for the following: labeling, date marking, tracking product from preparation to consumption, employee health, staff training, calibration of thermometers, and cleaning and sanitizing
6. Sample log sheets (e.g. cooling, thermometer calibration, staff training, etc.)
7. Equipment needed for process
8. Provide details on how person in charge will oversee process
9. Provide statements for the following: completed logs will be kept for 180 days
10. If operating in a shared kitchen, provide details on how food process will be protected

Please note that if any of the above are not provided or if not complete, then the review process will be delayed.



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