

Food Code Fact Sheet #18

What you should know about the Code

<https://oda.direct/FoodSafety>

Storing Raw Animal Foods in the Freezer

**OAR 333-150-0000,
CHAPTER 3-302.11(A)
(1)(C)**

(A) Food shall be protected from cross contamination by:
(1) Except as specified in (1) (c) below, separating raw animal foods during storage, preparation, holding, and display from:
(a) Raw ready-to-eat food including other raw animal food such as fish for sushi or molluscan shellfish, or other raw ready-to-eat food such as fruits and vegetables, ^P and
(b) Cooked ready-to-eat food; ^P
(c) *Frozen, commercially processed and packaged raw animal food may be stored or displayed with or above frozen, commercially processed and packaged, ready-to-eat food.*

PUBLIC HEALTH REASONS:

Raw animal foods shall be separated based on a succession of cooking temperatures since cooking temperatures as specified under § 3-401.11 are based on thermal destruction data and anticipated microbial load. For example, to prevent cross-contamination, fish and pork, which are required to be cooked to an internal temperature of 145°F for 15 seconds, shall be stored above or away from raw poultry, which is required to be cooked to an internal temperature of 165°F for 15 seconds due to its considerably higher anticipated microbial load. An exception is permitted for frozen, commercially packaged raw animal food to be stored or displayed adjacent to or above frozen, commercially packaged ready-to-eat food.

Historically, licensed facilities have been required to separate raw animal foods, such as beef, fish, poultry and pork from each other as well as from ready-to-eat foods in refrigerators and walk-ins. A change in the Food Sanitation Rules will extend this requirement to **freezer** units as well, but only for raw animal foods where their commercial packaging has been opened and/or the food has been repackaged. This is because raw or ready-to-eat foods that are packaged on-site present a greater risk of cross-contamination. Additional product handling, drippage during the freezing process, partial thawing or incomplete seals on the package increase the risk of cross-contamination from these products packaged in-house.

However, there is an exception for **frozen**, unopened commercially packaged raw animal food to be stored or displayed adjacent to or above frozen, commercially packaged ready-to-eat food.

The freezer equipment should be designed and maintained to keep foods in the frozen state. Corrective action should be taken if the storage or display unit loses power or otherwise fails.

Vertical Freezer Storage:

Store opened packages or repackaged meats and other foods in this order:

TOP SHELF

Ready-to-eat foods

Fish, Steak, Pork

Hamburger, Ground pork

Chicken, other poultry

BOTTOM SHELF



Raw meat, poultry and seafood can be stored with or above ready-to-eat foods in a freezer if all the items have been commercially processed and packaged.

Horizontal Freezer Storage:

It is acceptable to use smooth, non-absorbent, cleanable containers to separate products from each other across the bottom of a reach-in or chest freezer.