

COLD BREW COFFEE SAFETY

Code Sections: 8-201.13 When a HACCP Plan is Required, 3-502.11(D) Variance Requirement, 3-502.12 Reduced Oxygen Packaging Without a Variance, Criteria

Cold brew coffee isn't a new concept, but its sudden increase in popularity has surpassed available food safety research, leaving many consumers, brewers, and regulators in the dark about the foodborne illness risk factors associated with cold brew preparation and consumption. Cold brew is a coffee concentrate prepared by steeping ground, roasted coffee beans (a heat-treated plant food) in cold water for several hours. This process results in a pH and water activity range in which there is a potential for pathogen growth and toxin formation. As such, cold brew coffee is designated as a time/temperature control for safety (TCS) food. In canned, bottled, or kegged cold brew, mishandled product could cause botulism to grow and produce toxin. However, if prepared, stored, and served properly, the risks of illness after consuming cold brew are low.

Top Cold Brew Safety Concerns:

- **Temperature Abuse** (*increased microbial growth if not brewed, stored, and served at 41F or below*)
- **Time Abuse** (*increased microbial growth associated with extended shelf-life if held >7 days*)
- **Lack of Sanitation Standards & Knowledge** (*increased risk of contamination if employees do not know risks exist and if they do not follow good food safety practices, i.e. clean and sanitize equipment before use, protect coffee beans from contaminants*)

When a HACCP plan and variance is NOT required:

- Cold brew is brewed, held, and served at 41F or below, and
- Cold brew is date marked for no more than 7 days from the date of production, and
- If cold brew is kegged, or packaged by other means of reduced oxygen packaging (ROP), such as bottling, it is only held in packaging for 48 hours or less (after 48 hours product is discarded, removed from packaging, or unsealed), or
- Cold brew product is lab tested to indicate that it is not a time/temperature control for safety (TCS) food

When a HACCP plan and/or variance IS required:

- Cold brew is brewed, held, or served above 41F, or
- If cold brew is kegged or packaged using reduced oxygen packaging (ROP), it is held more than 48 hours (*any deviation for conducting ROP from 3-502.12 requires a variance*)



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