I would like to, if I may, take this opportunity to comment on Bill SB 901, regarding the adoption of a model food code, with special reference to the use of latex gloves in food businesses as stated in Section 11. Subsection (a) of section 19a-36F of the general statutes, which states that “No person shall use or require the use of disposable, sterile or sterile natural rubber latex gloves at a retail food establishment, including, but not limited to, a food [service] establishment, catering food service establishment or itinerant food vending establishment.”

The proposal of this section of bill SB901 may have intended to protect latex allergic workers and consumers in the food establishments. However, in view of better understanding of latex allergy today and the technological improvements of the natural rubber latex gloves, this proposal may not be necessary or relevant.

First, let me introduce myself. I am Dr. Esah S. Yip, the U.S. director of the Malaysian Rubber Export Promotion Council (MREPC) at the Embassy of Malaysia in Washington DC. The MREPC is a non-profit organization serving as an education and information center focusing particularly on gloves. We work closely with standard setting and regulatory authorities such as the American Society for Testing and Materials (ASTM) and the U.S. Food and Drug Administration (FDA), and with other governmental organizations, and trade, consumer and public interest groups.

I have spent 30 years conducting research on latex and rubber products at the Rubber Research Institute of Malaysia, one of the world’s largest research institutes on a single crop. I have authored and co-authored many papers concerning natural rubber and presented scientific findings at many international conferences on natural rubber latex and allergy.

From this perspective, I would like to provide information on available scientific data to support my position. In considering whether the use of natural rubber latex gloves
should be prohibited in food handling, I would like to bring to the attention of Members of this Committee the following:

According to the U.S. Food and Drug Administration, the Food Code is a model for safeguarding public health and ensuring food is unadulterated and honestly presented when offered to the consumer. The Food Code provides the best advice for a uniform system of provisions that address the safety and protection of food offered at retail and in food service. I believe such is the objective of the Food Code of the State of Connecticut.

**Why natural rubber latex gloves should be preferred?**

- The use of single-use gloves is highly recommended during the handling of food to prevent food being contaminated, and particularly so, to prevent infections transmitted to the food by unclean or infected hands of food workers. It is noteworthy that not all gloves in the market place have the same ability to provide effective protection against viruses and bacteria. One important reason why natural rubber latex gloves should be preferred is that they are known to have the most effective barrier capability among all the gloves available in the market place.

- Centre for Disease Control and Prevention (CDC) estimates that each year roughly 48 million people get sick from a foodborne illness, 128,000 are hospitalized, and 3,000 die. The CDC has even identified which foodborne bacteria, viruses, or microbes ("pathogens") are causing the most illnesses in the United States.

- Using gloves with effective barrier protection like those of natural rubber latex gloves should therefore be one safety measure to enhance public health.

**What about latex protein allergy?**

- A small portion of the general population, about 1 percent, is sensitive to the proteins found in latex. Allergic reactions can range from mild symptoms, such as hives, hay fever and itchy eyes, to asthma, and in very rare cases, anaphylaxis. However, not all who are sensitised are necessarily allergic.

- The problem of latex allergy first arose in health care settings, attributable to the use of an older generation of latex gloves where there was no control over protein levels. It is widely recognized that the cause of latex protein sensitization among healthcare workers was due to the use of these high-protein powdered gloves.

- Through years of research on latex proteins and advances in manufacturing technologies, the protein content of latex gloves has now been considerably reduced. Subsequent independent hospital studies in the U.S., Canada and Europe have demonstrated that switching from the older generation of high-protein, high-powder latex gloves to the low-protein, low-powder or powder-free gloves has resulted in a significant decrease in the incidence of latex allergies.
No definitive scientific evidence to support the use of natural rubber latex gloves in food handling is a serious health risk

- The Additives and Ingredient Subcommittee of the Food Advisory Committee to the U.S. FDA’s Center for Food Safety and Applied Nutrition (CSFAN) conducted a two-day hearing on the issue of using natural rubber latex gloves in food handling. After gathering and thoroughly examining information from independent experts and interested parties from the public, the Subcommittee reached a consensus and concluded: “The evidence is suggestive of a weak positive relationship between the use of natural rubber latex gloves and food-mediated latex allergic reactions. The data linking the presence of these [latex] proteins in foods to allergic reactions is based primarily on anecdotal evidence, and is very weak.”

Latex allergic individuals may react to cross-reactive fruits in the absence of latex gloves

- It is important to note also those individuals who are allergic to latex proteins can also react to proteins in some fruits like bananas, kiwis, avocado, chestnut, apple, carrot, celery, papaya, potato, tomato, melons – due to latex-fruits cross-reactions. As such, if a latex allergic person enters a restaurant eating one of the cross-reactive fruits, this allergic individual can display allergic reactions without actually coming in contact with any latex gloves.

It may therefore be concluded that with very little scientific evidence to support that the use of natural rubber latex gloves in food preparation causes allergic reactions through food ingestion, I believe any ban on natural rubber products or insertion of such a ban in the Food Code is unwarranted.

Furthermore, as compared to latex gloves, the threat and danger posed to sensitive consumers by ingredients in foods such as milk, eggs, peanuts, tree nuts, wheat, soy, fish and shellfish are much more serious, given that they have been estimated to cause more than 150 deaths annually, peanut allergy being the most common one. On the other hand, there is no reported death caused by latex allergy through food ingestion. The call for banning latex gloves or insertion of such a ban in the Food Code is really not justified without any strong scientific evidence showing that it is a real public health problem.

As you proceed with deliberations on SB 901, Section 11. Subsection (a) of section 19a-36F of the general statutes, may I respectfully suggest:

- An amendment to current law with an alternative to prohibiting the use of latex gloves and utensils by food handlers to be considered? A more advantageous course would be to amend the current law to permit the use of low protein latex gloves rather than an outright ban of all latex gloves.
In addition, the state and local government educate food service workers and their employers about the safe use of foodservice gloves to ensure maximum barrier protection against viruses and bacteria.

The inclusion of a food service glove standard (such as ASTM D7329) in the Connecticut law and its Food Code would also be beneficial in ensuring the gloves used in handling food meet qualities needed for food safety.

Thank you for this opportunity to comment.

References:
1. Latex glove barrier studies - http://www.latexgloves.info