



Wisconsin Food Code Fact Sheet



COLD BREW COFFEE

Cold brew coffee can be prepared with or without heat, and depending on how it's made, the final product may require refrigeration. If the production of the cold brew coffee lacks a heat step, the final product is considered a Time/Temperature Control for Safety (TCS) food and



requires refrigeration, unless evidence is provided to the Department to indicate it is a non-TCS food. In keged 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.

What are cold brew safety concerns?

- Temperature Abuse (increased microbial growth if not brewed, stored, and served at 41°F or below).
- Time Abuse (increased microbial growth associated with extended shelf-life if held >seven days).
- Reduced oxygen packaging.
- Lack of sanitation standards and knowledge (increased risk of contamination if employees do not know risks exist and if they do not follow good food safety practices, such as to clean and sanitize equipment before use, protect coffee beans from contaminants, etc.)
- Using food equipment that is not certified or classified for sanitation by an American National Standards Institute (ANSI)-accredited certification program or approved by the Department.

When are a Hazardous Analysis Critical Control Point (HACCP) plan and variance NOT required?

- Cold brew is brewed, held, and served at 41°F or below, and
- Cold brew is date marked for no more than seven days from the date of production, and
- If cold brew is keged and it is only held in the keg 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 TCS food.

When a HACCP plan and variance IS required:

- Cold brew is brewed, held, or served above 41°F, or
- Cold brew is keged or packaged using reduced oxygen packaging (this would include exchanging oxygen with another gas, such as nitrogen) and it is held more than 48 hours

Contact your inspector for a variance application.

Additional Information:

[Wisconsin Legislature: Chapter ATCP 75 Appendix DATCP Home Food Code Fact Sheets \(wi.gov\)](#)

