

**Conference for Food Protection  
2010 Issue Form**

**Internal Number: 027  
Issue: 2010 I-021**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

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**Title:**

3-304.14 Wiping Cloths, Use Limitation

**Issue you would like the Conference to consider:**

Some state/county regulatory jurisdictions only allow the use of reusable wet wiping cloths to wipe counters/equipment and require they be stored in a chemical sanitizing solution. Many retail establishments across the United States use dry disposable towels with pre-mixed sanitizer supplied in spray bottles in lieu of the wet cloth and bucket method. Some health authorities require that a variance must be applied for to use dry disposable towels with a spray bottle of sanitizer instead of the wet wiping cloths. The Food Code needs to recognize the use of dry disposable towels and a spray bottle of chemical sanitizer solution in lieu of wet wiping cloths stored in a sanitizing solution is an acceptable and equivalent method for wiping down counters and equipment.

**Public Health Significance:**

As long as the disposable towels are disposed of after each use, and the chemical sanitizer solution in the spray bottle meets the concentration specified under 4-501.114, there are no adverse Public Health consequences. This process has been in use extensively throughout the retail food industry without consequence for years. In fact, it can further minimize risks by avoiding the potential build up of organic material associated with the re-usable cloth and bucket method for wipe downs. It also maintains the correct concentration of sanitizer since it is not exposed to dilution and organic buildup. Annex 3, 3-304.14 essentially supports this issue in that it states that dry wiping cloths do not require being stored in a sanitizer solution at all times and disposable wiping cloths avoid the issue of buildup of soil from organic material.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to FDA requesting that section 3-304.14, section (B), be amended to add subsection 3 as follows:

3-304.14 Wiping Cloths, Use Limitation.

1. (A) Cloths in-use for wiping food spills from tableware and carry-out containers that occur as food is being served shall be:
  - (1) Maintained dry; and
  - (2) Used for no other purpose.

(B) Cloths in-use for wiping counters and other equipment surfaces shall be:

(1) Held between uses in a chemical sanitizer solution at a concentration specified under § 4-501.114; and

(2) Laundered daily as specified under ¶ 4-802.11(D); or

(3) Dry disposable towels used in conjunction with a spray bottle of chemical sanitizer solution at a concentration specified under § 4-501.114 are excluded from being maintained in a chemical sanitizer solution as long as the towels are disposed of after each use.

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