

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 III-008**

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

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

Allowing Specified Use of Hand Antiseptic in Place of Handwashing

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

Section 2-301.14 requires handwashing before certain tasks after the hands may have been contaminated in various ways.

Compliance with handwashing requirements is often difficult to obtain.

The healthcare industry relies heavily on hand antiseptics in situations where low soil and grease conditions are expected.

One specific scenario in food establishments is analogous. Handling payments from customers, either cash, check, or credit/debit cards, should not present heavy soil or grease conditions that would limit the hand antiseptic's effectiveness. Coupled with an increased compliance rate, the public health should be protected at the same or greater level compared with traditional handwashing.

**Public Health Significance:**

Allowing appropriate hand antiseptic use in place of handwashing in certain, limited circumstances would increase compliance and reduce the chances of the spread of pathogens.

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

a letter be sent to the FDA requesting the 2013 Food Code be amended as follows (language to be added is underlined):

2-301.14 When to Wash.

FOOD EMPLOYEES shall clean their hands and exposed portions of their arms as specified under § 2-301.12 immediately before engaging in FOOD preparation including working with exposed

FOOD, clean EQUIPMENT and UTENSILS, and unwrapped SINGLESERVICE and SINGLE-USE ARTICLES<sup>P</sup> and:

(I) Except as specified in ¶ (J). After engaging in other activities that contaminate the hands.<sup>P</sup>

(J) A hand antiseptic specified in §2-301.16 may be used according to manufacturer's directions instead of handwashing as specified under §2-301.12 when contamination may occur during a payment transaction.<sup>P</sup>

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