



Fact Sheet for Businesses Filling Growlers

This document is intended to provide food establishment regulatory guidance to businesses filling or refilling growlers or other beverage containers. This fact sheet only provides basic essential information and does not intend to provide answers to every operational scenario.

What is a Food Establishment and how does this impact a business that fills or refills growlers? In short, a food establishment is defined as an operation that stores, prepares, packages, serves, vends or otherwise provides food for human consumption. The definition of food includes alcoholic beverages. Although the regulatory definition of a food establishment does have some exemptions, refilling operations are not exempt. This means an operation that engages in filling or refilling beverage containers such as growlers is required to obtain a food establishment license through the Iowa Department of Inspections and Appeals or one of its contracting agencies.

How do businesses get a food establishment license? In order to obtain a food establishment license, a business must apply for a license and pass a pre-opening inspection. Although time frames for processing applications may vary from agency to agency, submissions of applications are required to be received by the licensing agency at least 30 days in advance of operating. Once an application is processed, the applicant is responsible for contacting the regulatory agency to schedule a pre-operational inspection. Communication with the licensing agency is important to ensure businesses are not negatively impacted by unnecessary delays. Operating a food establishment without approval from the licensing agency will result in penalties.

How does a business know which agency to contact regarding application submission? The following website lists the licensing agency and contact information based on the location of the business: <https://dia.iowa.gov/food-and-consumer-safety-bureau>

What are the requirements for operating a beverage filling or refilling operation? The State of Iowa has adopted the [FDA 2013 Model Food Code and Supplement](#) with some amendments.

Iowa Amendments to the Food Code can be found in Iowa Administrative Code 481-31.

What Food Code regulations have a significant impact on beverage filling operations? The following bulleted items are a summary of the regulations that will have a significant impact on a business's ability to obtain a food establishment license.

- A hand-washing sink with hot and cold water under pressure, soap and hand-drying must be accessible to the area where filling activities are performed. This hand-washing sink cannot be in a restroom and must be designated for hand-washing only with signage.
- If an operation intends to refill customer-owned containers, a container rinsing station with hot water under pressure is required. The water at the rinsing station cannot have recirculated water.
- Flooring in areas where filling and rinsing activities are performed must be smooth and easily cleanable. Carpeting is prohibited in these areas.
- The area where refilling and rinsing activities are performed must not be accessible to customers.
- A service sink or mop sink must be available on the premises of the business to dispose of mop water.
- Business employees that refill or rinse containers must wash their hands at the hand-washing station immediately prior to filling containers.
- Business employees that are ill may not engage in filling or rinsing operations. Specific illnesses and symptoms can be found in Chapter 2 of the FDA Model Food Code.

How do Food Code regulations specify how refilling of customer-owned containers is performed?

- Only containers that are designed for easy cleaning and are in good repair may be refilled.
- Customer-owned containers may only be refilled for sale or service to the same customer.
- A business employee must inspect the container for cleanliness. The employee then must rinse the container thoroughly and re-inspect the container for foreign material before refilling.
- After rinsing with hot water and inspecting the container, an optional cold water rinse is suggested to enhance beer quality
- The refilling mechanism should be cleaned and sanitized based on the manufacturer's recommendations. At a minimum the refilling mechanism should be cleaned and sanitized between each customer, and must be cleaned and sanitized at least once every 24 hours or at any time contamination may have occurred.



Are there different regulatory requirements if a business intends to exchange full growlers for empty growlers? If a business wishes to exchange containers instead of refilling a customer-owned container, the empty container must be washed, rinsed, and sanitized before it is filled and issued to another consumer. Businesses must have approved ware-washing facilities. This most generally will be a three-compartment sink.

If a business already has a food establishment license, how will filling or refilling beverage containers affect the business? Business locations that hold a food establishment license do not need to fill out an additional license application; however, filling and refilling facilities shall meet food establishment regulations. If a business is unsure if their operation meets requirements, the business should contact the appropriate food establishment licensing agency.

What else should a business know about filling or refilling growlers? The Brewer's Association has published a growler fact sheet. That document may be found at the following link: <http://www.draughtquality.org/wp-content/uploads/The-Facts-About-Growlers-v1.pdf> .

Who should a business contact if additional questions arise? A business should contact the food establishment licensing agency for answers to additional questions.