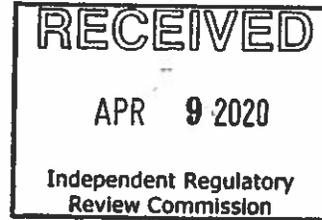


3255



April 9, 2020

Rodrigo Diaz, Chief Counsel
Office of Chief Counsel
Liquor Control Board
Room 401, Northwest Office Building Harrisburg, PA 17124-0001

Re: Regulation #54-101, IRRC #3255: Cleaning of Malt Brewed Beverage Dispensing Systems

Dear Mr. Diaz,

This letter is being submitted on behalf of the Pennsylvania Restaurant & Lodging Association (“PRLA”) and the Brewers of Pennsylvania (“BOP”). The PRLA and the BOP are significant stake holders in this proposed regulation and have a vested interest in the quality of the malt beverage products they sell. Please be advised our membership supports the proposed language of Regulation #54-101.

As a bit of background, in March of 2007, the Brewers Association formed a working group for draught beer quality under the direction of the Brewers Association Technical Committee. With contributions from leaders in the brewing industry, the Brewers Association Technical Committee authored a Draught Beer Quality Manual which outlined the best practices in delivering quality malt beverages to consumers and covered such topics as essential draught system components, equipment and configurations for direct draw draught systems, appropriate carbonation and carbonation dynamics, storage, glassware and its cleaning, and the topic which is most relevant to our request, system maintenance and cleaning. The project was founded, in part, by the United States Department of Agriculture. If desired, a true and correct copy of the Draught Beer Quality Manual will be provided upon request.

Most importantly, the working group noted that line cleaning involves working with hazardous chemicals and detailed that some chemicals are not appropriate for draught cleaning because residual chemical may be left in the system. The working group noted that after cleaning, it is necessary to flush cold water through the lines until the pH matches that of tap water. Based upon all of the relevant data, the working group recommended that draught lines be cleaned a minimum of every two (2) weeks, i.e. fourteen (14) days. We believe that requiring draught lines and faucets to be cleaned every fourteen (14) days, as specifically recommended by the Draught Beer Quality Manual is the best practices for all retailers and breweries in the Commonwealth. We believe that such a cleaning frequency will lend itself to the best quality beer served to consumers, reduce undo chemical residues in beer lines and provide a regulatory framework consistent with the best practices around the United States.

As such, on July 22, 2019, PRLA and the BOP jointly sent a letter requesting a frequency change of line cleaning from seven (7) to fourteen (14) days. Title 40 of the Pennsylvania Code, Section 5.51(c)(3) clearly states, "The Board may approve different cleaning frequencies." Due to this language, PRLA and BOP sought to bring forth this recommend best practice for all licensees in the Commonwealth by requesting the Board change the required frequency from seven (7) to fourteen (14) days.

Further, these actions not only more fully align with national guidance, but also reduces the loss of product and cost that licensees currently face through a weekly cleaning that has no actual benefit. Updating the rules to reflect this guidance is a win-win as it pertains to the safety of the product and licensee operations.

It was our hope that this change could have been approved by the Board previously, because we believe the language in §5.51 allows for it. There has been disagreement on that front and therefore we hope by going through the regulatory process, IRRC will swiftly approve this change.

Respectfully submitted,

DANIEL LaBERT
Executive Director
Brewers of Pennsylvania

ADAM HARRIS
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Brewers of Pennsylvania

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Pennsylvania Restaurant & Lodging Association