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• LETTER OF OPINION •

To: Health Commissioners, Environmental Health Directors, Nursing Directors, ODA Food Safety Specialists, and Other Interested Parties

Subject: LETTER OF OPINION #2001-01

Date: October 26, 2001

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Hair Restraint in Food Service Operations and Retail Food Establishments

This "Letter of Opinion" was reviewed and recommended by the [Retail Food Safety Advisory Council](#) at their October 17, 2001 meeting.

Many consumers are very sensitive to hair contaminating their food even though hair in food poses a minimal risk of causing foodborne illness.

The Ohio Uniform Food Safety Code that became effective March 1, 2001 addresses hair restraints in rule 3717-1-02.3. This rule states:

"Food employees shall wear hair restraints such as hats, hair coverings or nets, beard restraints, and clothing that covers body hair, that are designed and worn to effectively keep their hair from contacting exposed food; clean equipment, utensils, or linens; or unwrapped single-service or single-use articles. This provision does not apply to food employees such as counter staff who only serve beverages and wrapped or packaged foods, hostesses, and wait staff if they present a minimal risk of contaminating exposed food; clean equipment, utensils, or linens; or unwrapped single-service or single-use articles".

The intent of this provision is to keep hair from contaminating food and food contact surfaces if the probability for this to happen is reasonably high. Keeping this in mind, it is our opinion that individuals with a high potential of contaminating food by losing hair, handling their hair, or by their hair falling into food, *i.e. those food employees with primary duties in food preparation, need to have their hair effectively restrained.*

Food employees such as counter and wait staff do not need to have their hair restrained unless their hair is long and/or unmanaged and likely to come in direct contact with food. Food employees such as counter and wait staff with long and/or unmanaged hair need to restrain their hair through the effective use of hair control items such as visors, headbands, clips, barrettes, or ribbons to minimize the risk of their hair contaminating food and food contact items.

It is also our opinion that the need for hair restraints is primarily directed to head and facial hair. Hair on the arms and legs is not likely to come in contact with food. However, if an individual is mixing a food product such as meat and other ingredients for a meat loaf and their arms are in direct contact with the food product, gloves long enough to preclude direct contact with the food product would need to be used. The gloves would prevent any hair from the arms from contaminating the food product. It is impractical to cover all body hair and except for situations such as the example described, hair on arms and legs should not be a contamination issue.

With this said, it is still the prerogative of the facility to set requirements for hair restraint stricter than is indicated by the code for their employees.