

May 5, 2021

To: Brenda Bacon
Chair, Food Code Adoption Workgroup
Collaborative Representative, Conference for Food Protection

From: Mark Miklos
Partner & Advisor
Active Food Safety, LLC.

Re: Letter of Support

Dear Ms. Bacon:

The partners at Active Food Safety, LLC. are an experienced team of food safety professionals, thought leaders, and mobile product designers dedicated to providing the best business management solutions for today's food safety challenges in food service, retail food sales, and food manufacturing.

As former food safety program leaders of national or regional restaurant and/or retail food establishment operating companies we know first-hand the benefits of unified adherence to the current FDA model Food Code and we are pleased to support and encourage its adoption by all retail food regulatory programs.

Benefits of adoption include:

- Reduction of complexity which facilitates better compliance that in turn leads to more efficient control of foodborne illness risk factors to protect public health.
- Elimination of contradiction which affords businesses of all sizes the opportunity to expand across borders without worry about conforming to "different rules."
- Development by industry of their own food safety policies based on a single national standard which also reduces training costs by allowing utilization of one set of training standards across all jurisdictions.
- Facilitation of the processes for obtaining approvals for new equipment, variances, and HACCP plans.
- Establishment of a more standardized, risk-based approach to inspections and audits of food establishments along with the creation of a common/standardized food safety language that improves communication between regulators and industry operators.
- Standardization that allows comparison of performance data across national chains thereby allowing for the targeting of resources according to science and risk to improve the public health performance of food establishments.
- Elimination of redundant processes for the establishment of food safety criteria.
- Conformance with Standard No. 1 – Regulatory Foundation of FDA's Voluntary National Retail Food Regulatory Program Standards.
- Avoidance of errors caused when state and local jurisdictions adopt only selected sections of the FDA model Food Code.
- Empowerment of industry through jurisdictional reciprocity which enhances the whole of our food safety network.
- Improvement of consumers' understanding of food safety expectations; and

- Establishment of consensus in the regulations through a coordinated and collaborative process (Conference for Food Protection) which reflects input from all stakeholders: national, state, local, tribal, and territorial regulators, industry, academia, and consumers.

Staying current with the Food Code and embracing the best scientific practice that it represents is of utmost importance to the mission of protecting our communities from foodborne illness that has the potential to cause devastating health consequences and financial losses.

Active Food Safety, LLC. encourages members of the food industry to support retail food regulatory organizations' efforts towards the timely adoption of the most current version of the FDA model Food Code.

Mark Miklos
Partner & Advisor
Active Food Safety, LLC.
markmiklos@activefoodsafety.com