



May 3, 2021

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

From: Stan Hazan, MPH, Senior Director of Science & Regulatory Affairs at NSF International

Re: Letter of Support for Nationwide Adoption of the FDA Model Retail Food Code

NSF International strongly supports and encourages nationwide adoption of the most recent version of the FDA's Model Food Code by all State and Local retail food regulatory programs. NSF International has a 75+ year history of developing consensus national standards and providing conformity assessment/certification programs to food equipment manufacturers whose products are sold globally. Without a doubt, the benefits of standardization far exceed any costs associated with modifying regulations, especially in today's global economy.

As an independent third-party nonprofit health and safety organization, NSF conducts thousands of retail food safety audits for many national food chains including restaurants and grocery operations. One of our main challenges is having to tailor our audit criteria to comply with the many different rules across state, county, city and local regulations. Given the current patchwork of non-standardized and sometimes conflicting retail food safety regulations across the country, adoption of a single science-based food code can only help reduce foodborne illness, violations, costs and other risks.

Benefits of unified adherence to the current Model FDA Retail Food Code by State and Local retail food regulatory entities include:

- Reduction of complexity and greater compliance by all stakeholders;
- Greater opportunities for regulators, food workers and small businesses to work across different jurisdictions without having to learn, implement and practice different food safety rules;
- Empowerment of industry through jurisdictional reciprocity;
- Reduced training costs for regulators, food operators, food workers and third-party auditors;
- Elimination of redundant processes for establishing food safety criteria; and
- Establishment of a more standardized approach to inspections/audits of food operations.

Preventing foodborne illness through adoption of a single, consistent, science-based national retail food code is ultimately the best way to protect and enhance our communities. NSF International encourages all retail food regulatory agencies to support the timely local adoption of the most recent version of the model FDA Food Code. NSF International remains committed to protecting public health and stands ready to provide any type of support needed to accomplish the goals of this standardization effort.

Stan Hazan, MPH
Sr. Director, Science & Regulatory Affairs
NSF International
Office 1-734-769-5105 | Cell 1-734-945-4524
hazan@nsf.org