



May 20, 2021

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

Dear Ms. Bacon:

On behalf of the National Retail Federation (NRF), I am pleased to inform you of our position that all retail food regulatory programs, be they State or local, should adopt the most recent version of the U.S. Food and Drug Administration's model Food Code. Moreover, we support the Food Code Adoption Working Group's work in furtherance of that goal and commend the Collaborative for this effort.

By way of background, the National Retail Federation, the world's largest retail trade association, passionately advocates for the people, brands, policies and ideas that help retail thrive. From its headquarters in Washington, D.C., NRF empowers the industry that powers the economy. Retail is the nation's largest private-sector employer, contributing \$3.9 trillion to annual GDP and supporting one in four U.S. jobs — 52 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring, and communicating the powerful impact retail has on local communities and global economies.

As a trade association representing numerous chain restaurant, grocery and other food retail companies, we know well the benefits of widespread adherence to the current model FDA Food Code. We believe those benefits would be magnified if every jurisdiction would adopt the model Food Code and it were applied uniformly across the United States. Here are just a few examples of those benefits:

- Reduction of complexity for businesses that operate on a nationwide basis, as is the case for many of our food retail members;
- Elimination of redundant processes for establishing food safety criteria; and
- Establishment of a more standardized approach to inspections and audits of food establishments.

As you know, the model Food Code is periodically updated with the best available scientific data. Among other purposes, the model Food Code is also intended to identify existing and emerging risks and adherence to the latest version ensures mitigation against such new and novel threats. A governing jurisdiction's choice to stay current with the model Food Code and enshrine it in local law is smart public policy and is an excellent way to protect local communities from foodborne illness that can potentially cause devastating health consequences.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Vinson". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Scott Vinson
Vice President, Food & Energy Policy
National Retail Federation