



COMMONWEALTH of VIRGINIA

Department of Agriculture and Consumer Services

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*Bradley Copenhaver
Commissioner*

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

From: Pamela Miles
Program Supervisor
Virginia Department of Agriculture and Consumer Services

Re: Letter of Support

The Virginia Department of Agriculture and Consumer Services (VDACS) is pleased to support and encourage the adoption the most current version of the U.S. Food and Drug Administration's model Food Code by all retail food regulatory programs.

Benefits of unified adherence to the current model FDA Food Code by retail food regulatory entities (regardless of name) include:

- Empowerment of industry through jurisdictional reciprocity by enhancing the whole of our food safety network;
- Elimination of redundant processes for establishing food safety criteria;
- Establishment of a more standardized approach to inspections and audits of food establishments;
- Ensures food safety regulations reflect the most current food science available and evolve to reflect new science and knowledge, emerging technologies and to remain current with other federal laws;
- Created through a coordinated and collaborative process (Conference for Food Protection), the Food Code reflects input from all stakeholders: National, state, and local regulators, industry, academia, and consumers;
- Provides effective controls as a means of reducing the risks of foodborne illnesses within retail establishments, thus protecting consumers and industry from potentially devastating health consequences and financial losses;
- Facilitates and allows for standardization of inspections and inspectors;
- May result in cost savings in regards to inspections;
- Creates a common/standardized food safety language that can improve communication between regulators and industry operators;
- Uniformity of using the same Food Code allows comparison of performance across national chains by providing standardized inspection criteria. Thereby an establishment can target resources according to science and risk to improve the public health performance of retail food establishments;

- State and local agencies usage of FDA interpretations of Food Code reduces the workload associated with development of interpretations;
- Creates a common/standardized language between regulators and industry.
- Fosters a common understanding of risk, risk control/management and food safety between industry and regulators;
- Reduces industry Food Safety training costs by allowing the utilization of training materials which can be used across all jurisdictions;
- Avoids errors caused when jurisdictions adopt only selected sections of the FDA Food Code (cross references may be missed or overlooked or incorrectly referenced);
- Makes the process for updating laws and regulations at the State and Local level more efficient through elimination of redundant food code creation processes at the state and local regulatory level;
- Conserves resources by allowing regulatory software providers to develop inspection tools that work at all jurisdictions; and
- Demonstrates food safety commitment and therefore increases eligibility for federal training, grants, cooperative agreements and other resources.

Staying current with the Food Code is the choice to embrace the best scientific practice available as the tools to serve our mission of protecting our communities from foodborne illness that can potentially cause devastating health consequences and financial losses.

The Virginia Department of Agriculture and Consumer Services encourages all retail food regulatory organizations to join us in these efforts in supporting the timely adoption of the most recent version of the model FDA Food Code. We also offer our support to jurisdictions who wish to adopt the Code and are unfamiliar with navigating the process.



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