

National Restaurant Association Comments **Regarding**

Report of the FDA Retail Food Program Database of Foodborne Illness Risk Factors
October 26, 2000

The National Restaurant Association is the leading business association for the restaurant industry. The Association's 43,000 members represent more than 220,000 restaurant outlets. As such, the Association holds a vested interest in food safety. Recently, the Food and Drug Administration (FDA) announced the availability of the report entitled "Report of the FDA Retail Food Program Database of Foodborne Illness Risk Factors." The report is designed to establish a national baseline to determine compliance with the FDA Food Code recommendations as they relate to the Centers for Disease Control and Prevention-identified foodborne illness risk factors.

While the National Restaurant Association views food safety as "non-negotiable," the Association maintains that the FDA baseline data is nothing "new." The CDC-identified foodborne illness risk factors (food from unsafe sources, inadequate cooking, improper holding temperature, contaminated equipment and poor personal hygiene) have remained unchanged for over 25 years and have been the basis for all restaurant industry, food-safety training programs for the past twenty years. Through the Association's Educational Foundation's ServSafe® training program, over 1 million restaurant managers have been trained to focus their food safety efforts on these key elements.

The baseline statistics are certainly not representative of the entire restaurant industry or any segment of the industry. The report is only a snapshot of compliance with specific sections of the FDA Model Food Code, which have yet to be adopted by most states. FDA's criteria for "out of compliance" and the subjective evaluations in this report have therefore, not been agreed to by most regulatory authorities or industry.

Clearly, according to the FDA researchers, no conclusions regarding state food law compliance or food safety can be drawn from the report. We are encouraged that the FDA is now focusing attention on the risk factors that we have addressed as paramount for so long. We hope that the FDA will begin to work with industry to address the issues and gain wider acceptance of uniform, risk-based food safety criteria in the restaurant and retail industries.