



October 17, 2016

CR161-2016 Food Service Facilities Regulations - Amendments

Mr. Chairman and Members of the Howard County Council:

The *Restaurant Association of Maryland* supports the updates to Howard County's Food Service Facilities Regulations as outlined in CR161-2016. These updates are largely to incorporate recent changes to COMAR 10.15.03 into the Howard County food code. Other jurisdictions with local food codes have been doing the same.

We appreciated the opportunity to work closely with Howard County Health Department officials to address our concerns with earlier drafts of the proposed changes. Through that process, representatives of our industry helped to develop Reduced Oxygen Packaging regulatory language that is consistent with federal Food & Drug Administration (FDA) food code guidance. During this vetting process, we also realized that we need a lot more collaboration between our industry and Health Department officials to develop regulatory language for Sous Vide process/cooking method that is also consistent with FDA food code and industry practices. Therefore, we will continue working cooperatively to draft future regulatory language updates for addressing those issues.

Finally, we have no opposition to the proposed changes to the Sewage Disposal section of the regulations. Allowing flow meter data to be used in lieu of a standard flow per seat calculation method for system design capacity may be more practical in some situations. Moreover, incorporating such relevant information into land records will help make any site limitations more transparent to potential business property buyers.

For these reasons, we support these changes and respectfully request your approval.

Sincerely,

Melvin R. Thompson
Senior Vice President
Government Affairs & Public Policy