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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
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Mr. Robert Nyce, Executive Director
PA Independent Regulatory Review Commission
333 Market Street 14th Floor
Harrisburg, PA 17101

Re: Final-Form Regulation, PA Dept. Of Agriculture-
PA Food Employee Certification ID No. 2-107, 7 PA Code Chapter 76

Dear Mr. Nyce,

It has come to my attention that the American Food Safety Institute has requested a revision to the above regulation which to set the state minimum training standard for food employee certification at 8 hours, instead of the currently proposed 15 hours. I am writing to express my support for the revision.

The spirit and intent of this regulation is to reduce the risk of foodborne disease to the public by ensuring that at least one person at each food service establishment has received basic food safety education and passed a Department-approved examination. If this goal can be met in 8 hours, as the experience of many US health jurisdictions, AFSI and the National Grocers Association has shown then we should not impose greater costs of compliance on industry in the form of 15 hours of classroom training.

Furthermore, since health departments which inspect most of the food service establishments in PA (Bucks, Philadelphia, Allegheny and Chester counties) already accept the 8 hour standard, it is unfair to penalize businesses in these counties by requiring an additional 7 hours of training, especially since they already demonstrated their knowledge by passing a Department-approved examination.

For these reasons, I ask that you revise the regulations to include a minimum standard of 8 hours for food employee certification. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Matt".

Matthew Wright