

May 20, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852
ATTN: Docket No. 03D-0092

Dear Sir or Madam:

Founded in 1919, the National Restaurant Association is the leading trade association for the restaurant industry. Representing more than 60,000 members and over 300,000 restaurant outlets in 50 states, the District of Columbia, Puerto Rico and the U.S. Virgin Islands, the National Restaurant Association has always supported government security enhancement of the nation's food supply. The restaurant industry has a long standing commitment to food safety and food security to protect our customers and our industry. The safety and security of the food supply, our customers and our employees is a top priority, and has been underscored by the industry response to the September 11th attacks. The restaurant industry has invested billions of dollars in the last two years to improve food security and food safety. Our efforts have clearly made a difference in protecting our nation's food supply.

The National Restaurant Association would like to recognize that the Food and Drug Administration has taken prior industry's comments into consideration when developing its Guidance for Industry "Retail Food Stores and Food Service Establishments: Food Security Preventive Measures Guidance." We are pleased that the Agency has developed the Draft Guidance and feel that it can be used by the foodservice industry as a guide to improving food security.

Per industry's recommendation, the FDA recognized the fact that the restaurant and foodservice business is a very diverse one, composed of over 870,000 restaurant and foodservice locations in the United States alone. There is no possible way that a "one size fits all" approach to food security could work in every restaurant or retail establishment. The FDA obviously took this into consideration when developing its guidance document focusing on the food delivery systems within the controls of restaurant and foodservice operators. In addition, the stated limitations regarding restaurant size and capacity will certainly be helpful to those smaller locations.

We fully agree with the statement in the beginning of the document "Not all of the guidance contained in this document may be appropriate or practical for every retail food store or food service establishment, particularly smaller facilities. FDA recommends that operators review the guidance in each section that relates to a component of their operation, and assess which preventive measures are suitable." With this being stated at the outset of the guidance, restaurant operators can tailor food security programs to meet their individual needs. While we may disagree with certain individual recommendations

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included in the document for all restaurants, we find the document useful in light of the clear statement of intent by FDA noted above.

The National Restaurant Association fully appreciates the opportunity we've had to work with the FDA on the issue of food security. If the federal government and food industry are to work together in order to ensure the safety of the food supply, deploying available resources effectively and efficiently is the critical first step. We hope that we can continue to work together in order to further ensure the safety of this country's food supply.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven F. Grover". The signature is fluid and cursive, with a large initial "S" and "G".

Steven F. Grover, R.E.H.S.
Vice President, Health and Safety Regulatory Affairs

cc: Steven C. Anderson, President and Chief Executive Officer
Mary Adolf, Chief Operating Officer, NRAEF
Lee Culpepper, Senior Vice President Government Affairs and Public Policy
Jorge Hernandez, Vice President Science & Regulatory Relations
Allison Whitesides, Legislative Representative