



December 14, 2022

Nicole Hedeem  
Senior Epidemiologist  
Minnesota Department of Health

Dear Ms. Hedeem:

On behalf of the National Restaurant Association, this letter is to express our support of the proposed revision to Section 3-501.14(B) of the Food and Drug Administration's Model Food Code. Specifically, we support the concept of allowing for "shallow layering" of foods being actively cooled. We acknowledge that this will be presented as an Issue to the 2023 Conference for Food Protection.

The data you have shared show a correlation between this method of cooling and control of *Bacillus cereus* and *Clostridium perfringens* – both spore-forming bacteria that can cause public health concern when cooling foods. Additionally, the data suggest that this method is safe and allows for easier management of actively cooling foods within a restaurant setting.

The National Restaurant Association is the largest foodservice trade association in the world. We represent and advocate on behalf of more than 500,000 restaurant businesses. Our mission is to serve our industry and impact its success. We strengthen operations, mitigate risk, and develop talent; advance and protect business vitality through national, state, and local advocacy; and drive knowledge and collaboration.

Thank you for sharing the data you have collected and thank you for your efforts to promote and protect public health and food safety.

Sincerely,  
*Patrick L Guzzle*

Patrick L Guzzle  
Vice President, Food Science  
National Restaurant Association

Enhancing the quality of life for all we serve

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