December 30, 2016

Massachusetts Department of Public Health

Bureau of Environmental Health

RE: 105 CMR 590.000: *State Sanitary Code Chapter X - Minimum Sanitation Standards For Food Establishment*

To Whom It May Concern:

The Sally Frank’s Farmers’ Market (SFFM) in Melrose, Massachusetts wishes to submit the following comments on the proposed revisions to 105 CMR 590.00 for your consideration.

1. Under Section 590.010, farmers markets are subject to the same regulations for obtaining board of health approval as full-time retail food establishments.   
  
SFFM response: Under (B) Mobile Food Operations and (C) Temporary Food Establishments, the exemptions look to support farmers, however establishing the limit for board approval of 14 days places the majority of farmers markets into a food establishment role. Seasonal farmers markets should be included in the Temporary Food Establishments definition or exemptions extended to both seasonal and year round.  
  
2. Section 590.002 of the proposed regulations states that at least one food establishment employee be a full time person, defined as working eight hours and five days per week.   
  
SFFM response: We do not believe that this requirement is appropriate for farmers markets and other establishments that are not open on a full time basis. We recommend that this be addressed by including farmers markets in the exemption, or creating an exemption, to the full time requirement for establishments that operate on a part time basis.  
  
If you should have any questions on this testimony, please do not hesitate to contact me.

Sincerely yours,

Cindy Chabot