

February 23, 2016

I write today in opposition to Raised Bill 5212: An act concerning the licensing of food vendors.

Local health departments and health districts throughout Connecticut are charged with the execution of the Public Health Code and State Statutes. Each local jurisdiction must in turn reflect the municipalities that they serve. These municipalities have a cadre of local ordinances such as zoning and planning rules to regulate commerce within their town limits. Blanket rules such as this bill will reduce the ability of Connecticut's towns and cities to maintain their local flavor. Additionally, allowing vendors the ability to cherry pick a jurisdiction to be licensed under would work contrary to the long standing efforts of the public health system to regulate purveyors of food items and protect the health of the citizens of our state.

Please review the points below which highlight opposition to Raised Bill 5212:

- Each municipality must have the ability to maintain the planning and zoning ordinances passed by the representatives of those towns. This bill will allow vendors, unaware of local rules, to operate without oversight and affect the local flavor of a community.
- The ultimate threat to a food vendor is revocation of a license. If egregious violations are identified in one community, the ability of that health jurisdiction to act against these violations would be rendered moot.
- Municipal departments and districts set fees to raise revenue and maintain a responsible pool of vendors. This bill would allow mobile vendors to shop for the cheapest license fees without regard to regulatory oversight intended to protect the public health.
- All health departments utilize the public health code to standardize inspections for mobile vendors. Some towns with high numbers of mobile vendors have added local ordinances to address shortcomings with the generalizations of the public health code. Raised Bill 5212 would allow mobile vendors to circumvent these ordinances.
- Local health departments are the tip of the spear of public health. The experiences these departments use to shape policy are essential in the execution of good public health rules. For example, a town that has all of its sewage treated at a regional facility should not set policies for towns that exclusively use septic systems to treat sewage waste. The same philosophy applies to food service. Some municipalities work with mobile food units a routinely, but others do not. The learned experiences of these jurisdictions must be retained as the best available technology to keep the public safe and the public health system working effectively.

Respectfully submitted,

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