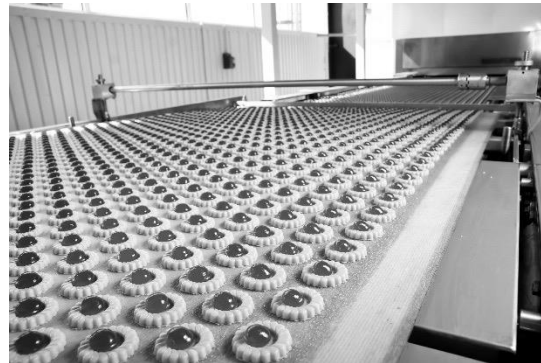




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## IFPTI Fellowship Cohort VI: Research Presentation

Odeisa Hichez, Food Inspector

2016-2017



# ***State and Territory Food Safety Regulation of Leased Commercial Kitchens (LCKs)***

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- Definition: “Leased commercial kitchens (LCKs)” offer space and equipment rental to food processors.
  - Processes in the same facility either *simultaneously* or in *sequence* can include baking, catering, acidified, low-acid, and foods requiring Seafood or Juice HACCP.
- Communal nature of LCKs where space and equipment is shared by multiple food processors:
  - May increase existing food safety risks, or
  - Create new ones not found in conventional food processing facilities.

Both literature and websites indicate apparent growth of LCKs:

Approximately 50% growth  
of LCKs nationwide between  
2013 and 2016

Source: Econsult Solutions, Mar. 2016

Registered kitchens in the U.S.  
September 1, 2016 = 654  
April 28, 2017 = 726

Source: CulinaryIncubator.com, 2017

The content, focus, and application of state food safety regulations or guidance for LCK owners and users on a national basis is currently unknown.



Image source: <http://www.gettyimages.com>

1. What food safety approaches are currently used by states or territories to regulate or provide guidance to owners of LCKs?
2. What food safety approaches are currently used by states or territories to regulate or provide guidance to users of LCKs?
3. What are the most common food safety issues identified by the states or territories that regulate or provide food safety guidance regarding the operation of LCKs?

- Reviewed the literature available on the subject
- Created a seven-question survey
- Emailed survey to directors or managers of state and territorial food safety programs that regulate LCKs:
  - Association of Food and Drug Officials (AFDO) Directory of State and Local Officials (DSLO)



Included 50 states, Guam, the Northern Mariana Islands, and Puerto Rico, grouped by geographic areas

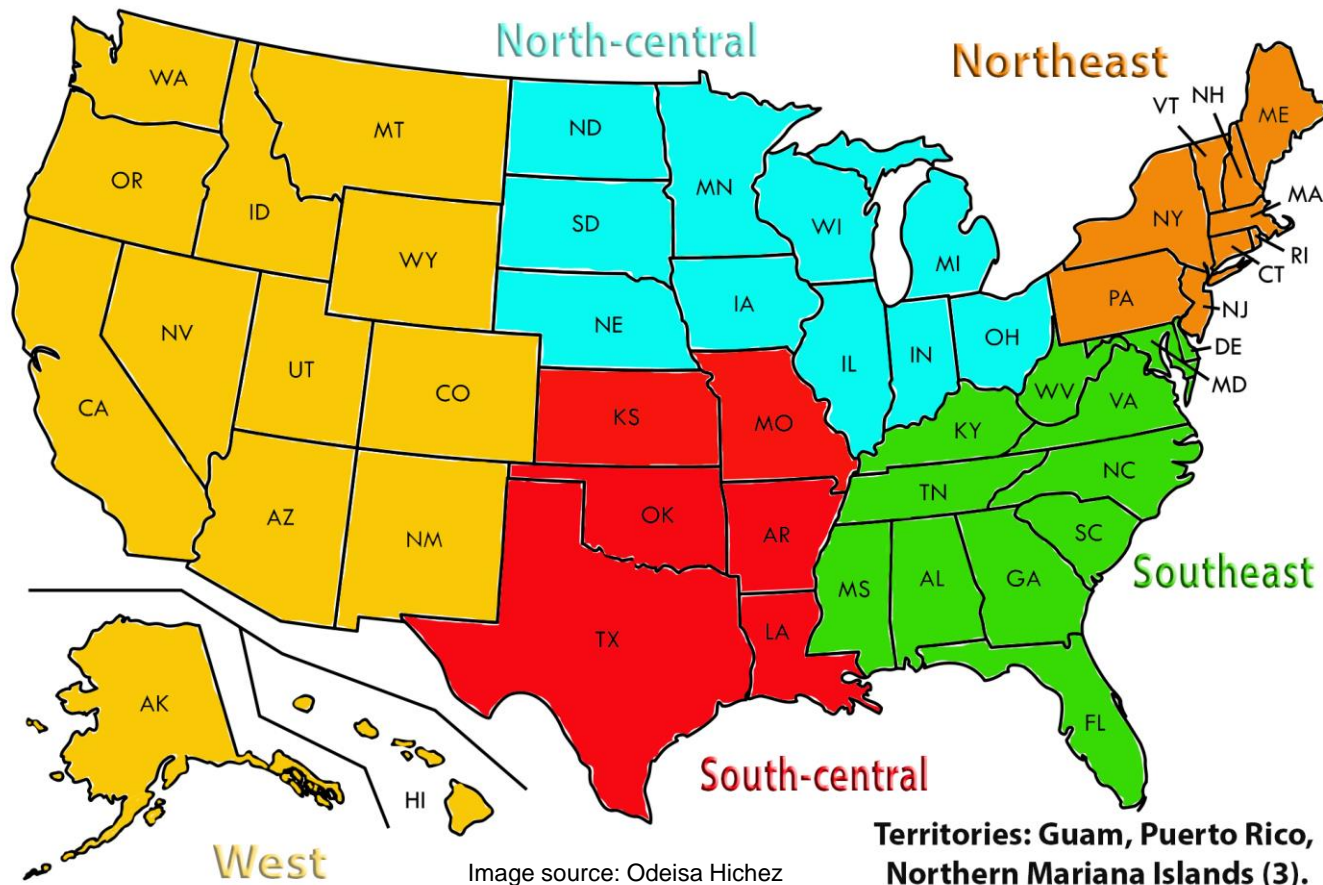


Image source: Odeisa Hichez



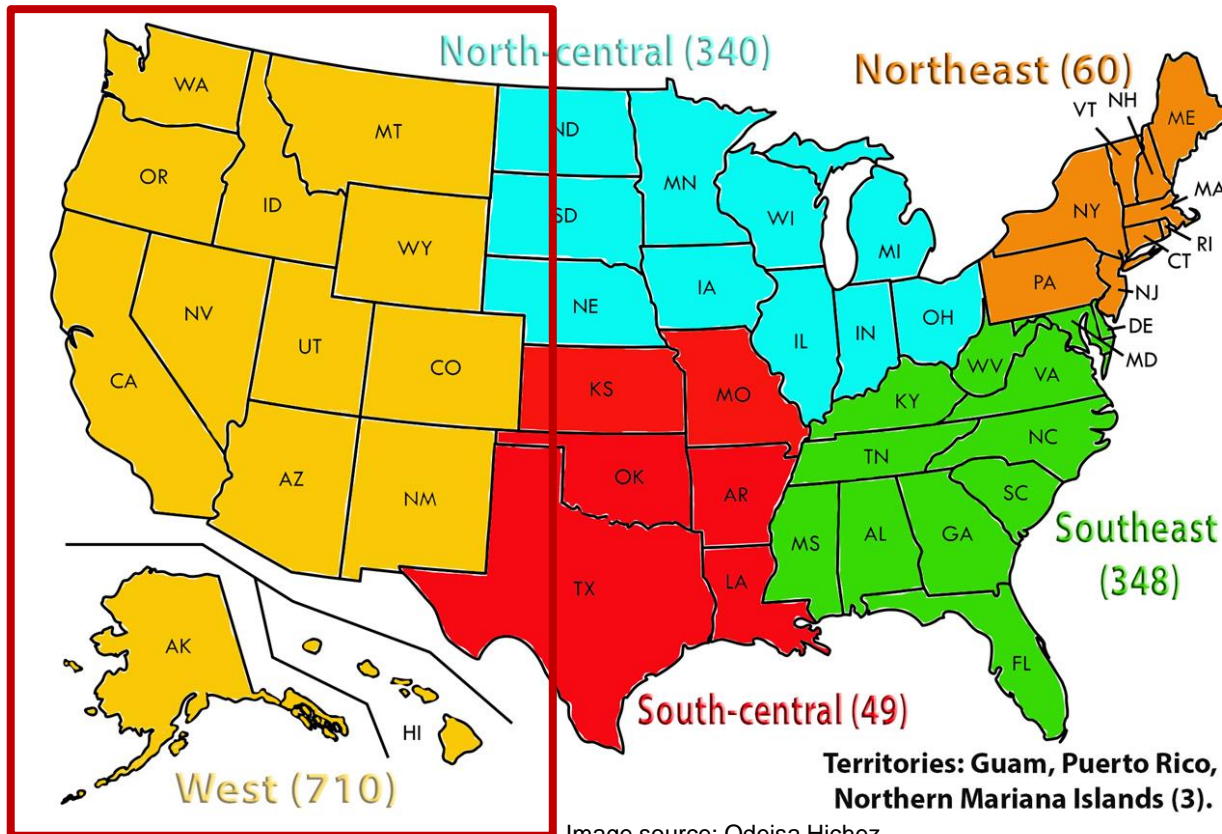
88 state and territorial agencies regulating food safety were contacted, which included:

>130 directors or managers of food safety programs

80 state and territorial agencies responded

62 state and territorial agencies reported having regulatory jurisdiction over LCKs

- Number of LCKs varies among geographic regions:
  - West region has greatest number at 710



- Knowledge of equipment and foods processed in the kitchens:
  - 56 out of 62 state agencies reported that the type food processing allowed was determined mainly by kitchen layout and equipment available
  - 6 state agencies (Southeast, North Central, West) reported having a few specific food processing restrictions

- Food safety regulations for LCKs:
  - 50 out of 62 state agencies reported not regulating LCK owners
  - 59 state agencies, food safety regulations based on GMP and Food Code
  - Three state agencies reported having specific food safety regulations and/or guidelines for LCKs:
    - South Carolina (*regulations only*) (1)
    - Georgia (*regulations and guidelines*) (2)
- Overall, results showed a lack of food safety regulations or guidelines tailored specifically for LCKs

- Most common food safety hazards regarding LCKs:
  - Cross contamination, including allergen cross contact (35)
  - Storage issues: space and security (30)
  - Off-site production (24)

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- Lack knowledge of actual number of LCKs:
    - Some agencies do not require the kitchen owners to register or be licensed
    - LCKs may not be considered food processing facilities; only the kitchen users; LCK concept should include owners and users
  - LCKs not recognized as unique business models:
    - Limited processing restrictions
    - Kitchen layout and equipment available might mislead on what is happening onsite

- Main food safety concerns shared across regions and territories:
  - Lack of regulation tailored for LCK owners and users
  - Current approach fails to address communal nature of LCKs



1. A national uniform food regulatory model or guideline specific for LCKs should be developed and include:
  - Formal definitions of LCKs, owners and users
  - Licensing of LCK owners
  - Defined responsibilities of LCK owners and users
  - Requirements for layout, including storage
  - Requirements for equipment and restrictions on types of food processing

- State and territorial food safety programs personnel
- New York State Department of Agriculture & Markets, Division of Food Safety & Inspection:
  - Stephen Stich, Division Director
  - John Luker , Assistant Director
  - Erin Sawyer, Director of Field Operations
  - Milford Lewis, Chief Inspector
  - Robert Samuel, Supervisor Inspector
  - Eugene Evans, Food Inspector
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# Questions?

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- [Survey Questions](#)
- [Table of LCKs by U.S. Census Geographic Area and Territories](#)
- [Table of Food Safety Concerns of LCKs by Geographic Areas and Territories](#)
- [Table of Food Safety Concerns of LCKs by Geographic Areas and Territories \(continued\)](#)