



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor
MANDY COHEN, MD, MPH • Secretary
MARK T. BENTON • Assistant Secretary for Public Health
Division of Public Health

March 26, 2020

MEMORANDUM

TO: Local Health Department Environmental Health Food and Lodging Programs

FROM: Shane Smith, Branch Head, Food Protection and Facilities Program,
Environmental Health Section

SUBJECT: Food Establishment Sale of Raw Meat and Meal Kits During the COVID-19 Pandemic

To help control the spread of the novel coronavirus disease (COVID-19), food establishments are restricted to carry out, drive through, and delivery services. With this transition, many have altered production lines or flow of food to aid in this process. We have received requests from counties and establishments asking about the sale of raw meats and meal kits. This memo provides NC Food Code requirements and NCDHHS recommendations for those establishments that would like to add to their existing menus by offering this service.

The sale of raw meats is allowed under the NC 2009 Food Code. Establishments may offer this service if adequate refrigeration space is available and proper separation of time and space during the establishment's workflow does not increase cross contamination risks. A safe handling instruction label per Food Code 3-201.11(F) must be included with the packaged raw product. A consumer advisory is not required but can be added to the menu if the establishment chooses to do so. If the facility wishes to sell raw shellfish or fresh seafood, they must hold the proper licensures from NCDEQ Shellfish Sanitation and NCDA & CS.

Meal kits must meet all applicable requirements in Chapter 3 of the NC Food Code for packaging, labeling and compliance with food LAW. If raw and ready-to-eat ingredients are to be sold with the kit, they must be in separate packages or containers to prevent cross contamination. Consumers must be informed if produce included within a meal kit has not been washed. Meal kits cannot be vacuum sealed or draw an air-tight seal without receiving a variance from the NC variance committee.

Permits are not required to be amended to allow for this change in menu if the establishment only plans to offer these items for a limited time during the COVID-19 outbreak. A visit to the establishment should be made to determine the adequacy of the operating procedures to allow for the sale of raw meats and meal kits. A completed comment addendum is sufficient to allow for this change in process for a temporary period during the outbreak.

Please contact your Regional Specialists with any questions or concerns with this allowance. If we can help in any way during this time, please let us know.

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF PUBLIC HEALTH

LOCATION: 5605 SIX FORKS RD, RALEIGH NC 27609
MAILING ADDRESS: 1632 MAIL SERVICE CENTER, RALEIGH NC 27699-1632
www.ncdhhs.gov • TEL: 919-707-5854 • FAX: 919-845-3972

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

