

To: Representative Trevor Squirrell, Chair of the Legislative Committee on Administrative Rules

From: Natalie Weill, Public Health Policy Advisor, Vermont Department of Health

Re: Manufactured Food Emergency Rule

Date: August 4, 2025

Following the filing of the rule for LCAR, the Department of Health made the following changes to the proposed rule based on feedback from Legislative Counsel under 3 V.S.A. § 844(f):

1. Section 4.1.6.10 through 4.1.6.14 were amended to fix a formatting error. No text was amended, only spacing was changed.
2. Section 4.1.6.14 was amended to align with statutory language. “...~~any~~any other goods defined by the Commissioner in policy or pursuant to law.”
3. Section 6.1 was amended for consistency. The following amendment was made: “...a food manufacturing establishment claiming a license exemption shall submit a licensing exemption filing to the Department to demonstrate compliance with ~~this~~these Rules and attesting to completion of the training required in accordance with 18 V.S.A. § 4303(a)(7) and Section 6.2.2 of this rule.”
4. Section 6.1.2 was amended for clarity. The following amendment was made: “...the cottage food operator may submit a request to the Department for a determination regarding whether the product they cottage food operator is~~are~~ making is a cottage food.”
5. Section 6.2.2.1 was amended to increase clarity and fix an error, respectively. The following amendment was made: “...healthfulness and attest to the completion of the training as required by Section 6.1 of this rule~~to the Department~~.”

No further amendments were made to the Manufactured Food Emergency Rule.