

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 II-013**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

AC #3 - Amend Food Code for Major Food Allergen Training for Food Employees

**Issue you would like the Conference to consider:**

Amend the Food Code to remove allergy awareness training from Paragraph 2-103.11(N) and add a new Paragraph in Section 2-103.11 with recommended components of food allergy training.

**Public Health Significance:**

Regulatory requirements for labeling major food allergens on packaged foods are very thorough. However, foods that are available for immediate consumption and not pre-packaged do not provide the same level of disclosure of packaged foods. Food allergic consumers often ask on site staff to share information about ingredients and allergens. They must rely on questions to staff who may not have an answer; or worse, give inaccurate information. Staff error has yielded catastrophic results, including fatalities. To protect consumers that have food allergies food employees must have knowledge of the major food allergens, symptoms they could cause, and methods to prevent problems with food allergens.

Even though the Food Code requires that the Person In Charge (PIC) shall ensure that employees are properly trained in food allergy awareness, research and survey results show that food employees are often not adequately trained in food allergy awareness, which puts consumers at risk.

Please refer to Supporting Attachments:

1. Allergy Training Courses and Laws
2. Allergen Committee Survey
5. Restaurant servers' risk perceptions and risk communication-related behaviors when serving customers with food allergies in the US
6. Comparing the Eating Out Experiences of Consumers Seeking to Avoid Different Food Allergens

## 8. Food Allergy Knowledge and Attitudes of Restaurant Managers and Staff: An EHS-Net Study

### **Recommended Solution: The Conference recommends...:**

that a letter be sent to FDA requesting that Paragraph 2-103.11(N) of the most recent edition of Food Code be amended as shown below (stricken language with ~~strikeout~~), and a new Paragraph be added to Section 2-103.11, as shown below (new language underlined):

2-103.11 Person in Charge

The PERSON IN CHARGE shall ensure that:

(N) Employees are properly trained in FOOD safety, ~~including FOOD allergy awareness~~, as it relates to their assigned duties;

EMPLOYEES are properly trained in FOOD allergy awareness, as it relates to their assigned duties. This training should include, but is not limited to:

- Identification of the major FOOD allergens;
- FOOD allergen ingredient identities and labeling;
- Knowledge of cross-contact concerning the major FOOD allergens;
- Recognition of symptoms of an allergic reaction;
- How to respond to an allergic reaction.

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