

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 II-005**

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

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

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

---

**Issue History:**

This is a brand new Issue.

**Title:**

Demonstration of Knowledge regarding Food Allergen Labeling

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

Adding an amendment to the 2013 FDA Food Code section 2-102.11(C)(9) to include describing proper food allergen labeling for products, when applicable, produced by the venue.

**Public Health Significance:**

Pre-packaged products from bakeries, delis, restaurants, and other venues often are not labeled with allergens that they contain (a violation of the Food Code section 3-602.11(B) (5)), nor the potential allergens that may have been in contact with the products. This poses a serious risk to allergic consumers who may experience anaphylaxis as a result of exposure to the allergens.

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

that a letter be sent to the FDA requesting that Subparagraph 2-102.11(C)(9) of the 2013 Food Code be amended as follows (new language is underlined):

2-102.11 Demonstration.

(C) Responding correctly to the inspector's questions as they relate to the specific FOOD operation. The areas of knowledge include:

(9) Describing FOODS identified as MAJOR FOOD ALLERGENS and the symptoms that a MAJOR FOOD ALLERGEN could cause in a sensitive individual who has an allergic reaction. Describe proper food allergen labeling for pre-packaged products produced by the establishment.<sup>Pf</sup>

**Submitter Information:**

Name: Nona Narvaez

Organization: Anaphylaxis and Food Allergy Association of MN (AFAA)

Address: 2200 Hendon Ave  
City/State/Zip: St. Paul, MS 55108  
Telephone: 6516445937  
E-mail: nona@minnesotafoodallergy.org

*It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name  
or a commercial proprietary process.*