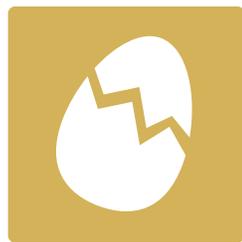


How to Protect Your Business from Customer Allergic Reactions



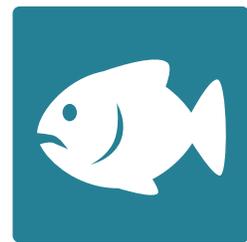
Dairy



Egg



Crustacean
Shellfish



Fish



Tree Nuts



Wheat



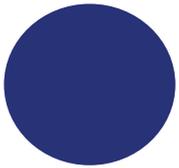
Peanuts



Soybeans

A Food Safety Guide for Food Services





Contents

Chapter 1 Introduction	p.3
Chapter 2 Food Allergen Risk: Assessing Your Business's Risk	p.4
Chapter 3 Food Allergen Sufferers: Who is At Risk and The Impact on Your Business	p.9
Chapter 4 Food Allergen Reaction: What To Do If It Happens	p.10
Chapter 5 Food Allergens: Protecting Your Business	p.11
Chapter 7 The EHA Advantage	p.12

About EHA Consulting Group Inc.

EHA Consulting Group, Inc. (EHA) offers comprehensive public health consulting, epidemiology and food safety services before, during and after a crisis. We provide these services to Retail Food, Food Service, Food Processing, and Contract Food Service Management companies.

Need our Services? Call us today at 800-969-1441.

Visit us at www.ehagroup.com. Follow us on Twitter @EHAConsultingGp.

C1

Introduction

“Up to 15 million Americans have food allergies, 1 in every 13 children under the age of 18.”



The following guide from EHA Consulting Group, Inc. (EHA) contains information and best practices for a foodservice operator to handle allergens and attend to the needs of customers. The purpose of the guide is to educate you on the proper steps to protect your customers and your business from the negative ramifications of an allergic reaction to the food you serve.

When it comes to food allergies, what you don't know could hurt you - as a customer and as a business owner. Up to 15 million Americans have food allergies, including one in every 13 children under the age of 18. Catering to this large number of potential customers to ensure they can safely eat at your food establishment is a vital business practice.

Food allergies are a reaction of someone's immune system to any number of foods that are perceived by the immune system to be a threat, but are eaten everyday without adverse effects to the general population. Therefore, for the unlucky patrons who could accidentally consume one of the over 170 foods that trigger a range of symptoms from a rash to death, it is imperative that they know what is in their served food. Just as importantly, the people in your business who are responsible for preparing, distributing, and serving these foods need to know what ingredients may cause a customer to have an adverse reaction.

Every year, allergens cost businesses \$25M as they are sued, fined, or shut down due to a customer's illness or, in 200 cases each year in the USA, death. These repercussions stem from the following allergen risks in a food service establishment:

- A. Cross Contamination
- B. Inadequate Employee Training
- C. Poor Communication with Customers
- D. Lack of Food Allergen Labeling

The guide provides the initial information to arm customers and staff with the knowledge they need to proactively protect your business from the effects of customers experiencing allergic reactions. However, for comprehensive protection, your business needs to complete a full risk assessment and remediation plan, which EHA, 30 plus-year food safety veterans, provides for businesses of all sizes, nationally and globally.

“Fryers, cutting boards, refrigerators, blast chillers, table tops, utensils and even wet wiping cloths could easily breed cross contamination.”



Allergen risks to a food service establishment fall into three main categories:

- A. Cross Contamination
- B. Inadequate Employee Training
- C. Poor Communication with Customers
- D. Lack of Food Allergen Labeling

A. Cross Contamination

A major allergen risk originates from cross contamination. It is crucial to understand both where allergens exist in the facility and how to create controls to minimize the risk of cross contamination.

One major hazard zone is cross contamination during food prep. A best practice is to purchase a commercially available allergen kit. This allergen kit contains color-coded tools, along with a cutting board, which could be helpful for deciphering allergen foods and preventing cross contamination. The existing best practice of using six differently colored cutting boards enables establishments to separate preparation of dairy products (mainly cheese), fish, red meats, chicken (which could also be used for eggs) ready-to-eat foods (including baked goods) along with fruits and vegetables.

After controlling for cross contaminating allergens on cutting boards, how should your business account for shellfish, soy, peanuts and tree nuts? With over 170 allergens, there are far too many allergens to have color-coding tools in place to address. For example, a rapidly growing area of concern is clients that have gluten intolerance or Celiac's disease. How is gluten treated relative to the other major food allergen groups during storage and food preparation? And even with color coding, could peanut butter make its way to the cutting board for ready-to-eat foods and potentially affect a patron?

Another hazard zone for cross contamination is kitchen equipment. Could the products that were cooked on the grill or flattop be contaminated with soy or wheat because of a shared spatula or tongs? The main risk comes from storing foods atop others and transferring an allergen containing food that could contaminate another food container and, ultimately, the ingredient inside. Chopping, grinding and slicing equipment have a particularly high risk because the size of the food changes and may not allow for a complete recovery of products. Fryers, cutting boards, refrigerators, blast chillers, table tops, utensils and even wet wiping cloths could easily breed cross contamination.

C2

Food Allergen Risk: Assessing Your Business's Risk

“You will need to assess the ability of the equipment to be easily cleaned.”



There are even more chances for cross contamination within service zones with the placement of any allergens on the buffet, toasters, condiment stand, or salad bar. While many food codes require utensils for each food available, are you sure customers are properly using the utensils? Too many times, the knife used to spread jelly on a bagel is then used to place peanut butter on the same bagel. The contaminated knife goes back into the jelly and cross contamination has occurred.

Did anyone witness the cross contamination or take action? In this instance, your staff must be trained to remove and replace all utensils from the allergenic product and the non-allergenic product. The product that you removed should be immediately discarded and all the containers and utensils washed, rinsed, and sanitized. Regular utensil replacement will limit the risk of accidental exposure, but cross contamination in public food service areas, like buffets, has the potential to go completely unnoticed by the staff. Cross contamination that is not noticed and acted upon may be the factor that exposes a customer in your business to an undeclared allergen.

Finally, cleaning is a major hazard zone. During daily or periodic cleaning, the production that involves allergens could contaminate the other areas of the facility. A thorough cleaning is required. You will also need to assess the ability of the equipment to be easily cleaned and identify areas of potential risk. For example, are there spaces or places where food debris could be trapped in the equipment? If so, how will you treat the equipment?

Cleaning supplies and routines necessitate consideration as well. Soap is imperative as water alone will not remove allergens from the equipment. However, if you are dry cleaning with brushes, air, vacuums, or scrapers, will this method of cleaning allow allergens to become airborne and increase the likelihood of allergen drift to areas of the kitchen? And once the cleaning is completed, who is conducting an inspection of the area, equipment, materials, tools and debris to assure that all allergens were eliminated and removed properly?

Your business needs to employ someone that has the skills, abilities and understanding of sanitation to assess these areas of cross contamination concern. EHA is readily available to be your expert.

“Daily meetings with kitchen and wait staff are essential to highlighting allergens and ensuring necessary information is available throughout service.”



B. Inadequate Employees Training

Employee allergen training is imperative as it is the strongest form of defense against business risk. Food handlers and chefs must have control and knowledge of potential allergens and cross contamination - and it is equally important for front of house staff to be informed of the same. Kitchen staff are often more informed about allergen, but wait staff must be well versed to help patrons navigate the menu while averting allergens. Are you confident your wait staff will have accurate details to convey?

Service staff can usually answer questions about foods in a facility, but you need to alert them about allergens in particular dishes. If the staff does not know, how can information be communicated to the customers? Cooking a product does not remove an allergen risk. As such, daily briefing on service, special events, daily specials, and allergens needs to be a part of setup for service.

There are a number of ways in which you can ensure your staff is fully educated on identifying allergen risks, understanding potential issues, and addressing any issues with customers.

An easy best practice is to facilitate constant communication. Daily meetings with the kitchen and wait staff are essential to highlighting allergens and ensuring necessary information is available throughout service. The few minutes in a day it takes to update the staff will make customers informed and empowered to make the right food choice for their dietary needs.

The attention that goes into training and communications can mean the difference between a pleasant dining experience and lost patrons from the fallout of an unpleasant one.

The other best practice is to bring in consultants, like EHA, to conduct comprehensive training and establish strong communication.

“The code in some jurisdictions state that “All allergens will be identified on the signage or a food”.”

FOOD ALLERGY NOTICE
PLEASE BE ADVISED THAT FOOD PREPARED HERE MAY CONTAIN THESE INGREDIENTS: MILK, EGGS, WHEAT, SOYBEAN, PEANUTS, TREE NUTS, FISH AND SHELLFISH

C. Poor Communication with Customers

Even with the best trained employees, there is room for error in customer communication. Customers may assume prepared food does not contain an allergen, but it is prudent to provide customers with allergens used in your facility.

The Food Allergen Labeling and Consumer Protection Act (FALCPA) requires that allergens are clearly listed on the labels of packages sold at the retail level, but most restaurants are able to determine what information they are willing to display and in what format. Some jurisdictions require allergen statements on the signage for a food, so please check with your local health department for the depth and placement of allergen information.

A best practice is to have a general allergen statement covering all foods. An example statement to customers may read:

“Consumers are to be aware that the foods in this establishment are produced in a kitchen that has or uses food allergens.”

To assist in clear communication with customers and decrease your business risk, EHA created a free Allergen Communication Kit. Along with this guide, the kit is downloadable from the EHA website (www.ehagroup.com) and can be used in your establishment to communicate with customers with allergens.

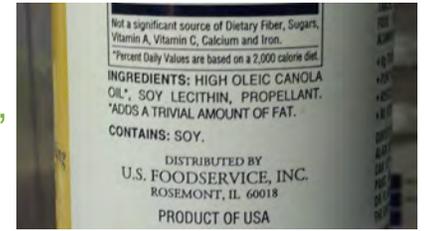
Allergen Communication Kit from EHA

Kit includes artwork to print as posters, table cards, and menu cards.



“A food service establishment must remain vigilant as not all allergens are covered for labeling under law.”

D. Lack of Food Allergen Labeling



Allergen reaction prevention begins with inventory intake and control. Food establishments must follow FALCPA, passed in 2004. FALCPA identifies 8 major food allergens (milk, egg, peanut, tree nuts, soy, wheat, fish, and crustacean shellfish) that are responsible for over 90% of serious adverse food-induced reactions in the U.S. Under FALCPA, products containing these 8 major food allergens must clearly list the food allergen on the label in simple language. Intake, labeling, and storage of foods with allergens should have a clear control plan and be part of the facility's risk assessment.

Products that come through the back door that already have the allergens and are clearly marked raise little concern, but what if there is an allergen in them and you may or may not know about the allergenic content. For instance, are you sure that all the oils that are used in the facility are allergen free? How would you know if your spray oils contain the soy protein or dairy? Should you be concerned about processing agents like pan sprays and coatings? Are there quantities that could cause a customer to have an allergic reaction?

While FALCPA is of major assistance to labeling control, FALCPA only regulates the retail level. Since processors are not subject to the rules of FALCPA, a food service establishment must remain vigilant to understand allergens covered for wholesale labeling under law. For example, soy protein in the hamburgers will have no allergen alert or statement because the processors who sell to wholesalers have no legal obligation to declare allergens.

Similarly, it is important to understand the risk of FALCPA nuances. Did you know highly refined oils and their derivatives produced from the 8 major allergen foods represent a labeling exemption? However, less well-refined and cold-pressed oils can contain protein and can be hazardous for individuals with food allergies.

One trick of the trade is to maintain a production matrix that tracks allergens. Labeling and tracking allergens as they are introduced into the kitchen and handled throughout food preparation has to become a key component of risk analysis. It is optimal to continually update the entire allergen program, however there is seldom time to commit, so a program matrix will help assure that all the allergens are labeled, tracked, and handled correctly.

Remember, try isolating allergens in storage and preparation areas by labels, cook allergen free foods first, protect allergen free foods, change utensils after each product, wash hands with soap and water after handling allergens, change aprons or uniforms when contaminated, clean preparation areas and equipment completely after any allergens, and do not share foods in the kitchen.

Comprehensive labeling and review will ensure that food handlers are aware of allergens embedded in raw ingredients. EHA can provide guidance to allergen control for both clearly labeled foods and vague ingredient references that could cause harm to patrons.

C3

Food Allergen Sufferers: Who is At Risk and The Impact on Your Business

“If they feel your business does not adequately understand the importance of clearly communicating about allergens in food, they will not eat at your establishment.”



There are two types of people at risk of having an allergic reaction at your business: those who know their allergens and those who don't. There is little you can do about preventing someone who has an allergic reaction for the first time, so the main focus must be to ensure those who are aware of their food allergies are clearly informed of allergenic ingredients in each dish.

Understanding which foods will cause reactions for which customers - for both the server and patron - is not always straight forward. Unfortunately, an allergen consumed at a lower ingested amount can cause a more severe reaction with increased exposure. The most important thing that can be done is to avoid the food or food ingredient altogether, but that is based on the information a customer has access to prior to making a menu choice. A best practice is for all servers to ask all customers: “Does anyone have any food allergies or sensitivities that the kitchen needs to be aware of prior to placing your order?”

The adverse business effect of poor preparation against risk allergens is not just a reaction from food served, but a loss of business from patrons who avoid the establishment because of the lack of confidence in avoiding the risk. Many people with allergies fear incompetence by food establishments and, if they feel your business does not adequately understand the importance of clearly communicating about allergens in food, they will not eat at your establishment. Conversely, people with allergies may select your restaurant because you are an allergy-friendly restaurant, with placement on websites like www.allergyeats.com, pointing diners in the right direction. With up to 15 million Americans having food allergies, 1 in every 13 children under the age of 18, catering to this large number of potential customers so they can safely eat at your food establishment is a vital business practice.

Unfortunately, there are countless stories, year after year, of patrons falling ill (or worse) after consuming food that unknowingly contained an allergen. In 2010, a seventh-grader in Chicago suffered a severe allergic reaction and died after consuming food from a party held at her public school. The party was catered by an outside vendor, who was previously made aware of the student's severe peanut allergy. Somehow, this warning was not communicated to the kitchen staff who prepared the food and lab testing revealed the food contained trace amounts of peanut products. The child's family filed a wrongful death suit for damages greater than \$100,000 and the restaurant was subsequently forced to shut its doors*.

This is just one harrowing example of the consequences that can arise if allergens are not handled and labeled correctly. Other examples from our practice include multiple deaths associated with shrimp incorporated in food and serious dairy allergy resulting in significant gastric disorder for a patron of a restaurant who specifically asked a waiter if a particular menu item contained dairy after alerting him of a dairy allergy. Although no litigation ensued, the restaurant did end up waiving a \$300+ meal for the party, with appropriate apologies and the promise of counseling their staff.

C4

Food Allergen Reaction: What To Do If It Happens

“To prepare for the worst case scenario, it would be prudent to conduct first-aid training on dealing with an allergenic reaction”



One of the most frightening events that could happen in your restaurant is a patron experiencing an allergic reaction to a food prepared in your kitchen. The timing and severity of the reaction could vary due to a variety of factors:

- Amount of the Allergen Ingested
- Consumption Prior To Ingesting the Allergen
- Form of the Allergen (Raw, Cooked, Processed)
- Age of the Patron
- Sensitization to the Allergen
- Rapidity of Absorption

You could have minutes to react or it may be hours until the result of ingesting the allergen manifests itself. In the case of an immediate reaction, the best case scenario is that the customer has the appropriate medications to treat himself or herself. To prepare for the worst case scenario, it would be prudent to conduct first-aid training on dealing with an allergenic reaction. Staff and management must react quickly to an incident involving exposure to an allergen. Do not sit the person upright as it increases the risk of anaphylaxis and suffocation. In these cases, a staff person at the scene should call 911 or EMS immediately. It is imperative that the customer is transported in an emergency vehicle immediately to the nearest hospital emergency department for further medical treatment and observation.

When training management and staff, it is important to conduct a drill for allergic reactions that holds the same weight as reacting to a fire, flood, natural disaster, accident or threat. Just as with the response to a choking incident, everyone must be assigned a role and perform that role quickly and effectively.

Whether they care for the customer, retrieve the first aid kit that could be used to treat additional injuries, call 911, or wait for the first responders, staff should have clear responsibilities and plan of action. The delay or failure to administer prompt and proper medical attention has contributed to many fatal anaphylaxis cases from food allergies. Nothing should be left to chance in any emergency situation and planning ahead will minimize the negative impact.

C5

Food Allergens: Protecting Your Business

“Operations personnel may be too close to the problems to objectively recognize the risk you have in the kitchen.”



The next step is to provide your customers and staff with training and customer communication tools about the allergens in your dishes. As referenced above, EHA provides a free communications kit, downloadable from the EHA website (www.ehagroup.com). The guide and communications material is intended to help train your staff and embed into the regular communication about your food, both online and at your establishment.

The final steps are to undertake a risk assessment and remediation plan by professional food safety experts. EHA provides you with this service on two levels:

- Basic Level Training Program: Conducted via online webinar
- Comprehensive Full Risk Assessment & Remediation Plan: conducted in person by EHA at your business

What is a Comprehensive Full Risk Assessment & Remediation Plan?

We need to look deeper into the process of food preparation, which includes what happens in the warehouse, the delivery truck, the store room, the refrigerator, across the preparation table, the hot holding box, at the display case, and other areas where risk analysis for cross contamination have not been conducted and/or there is no measure in place to prevent or eliminate these risk factors. Have you looked at the risk in each of these areas, or maybe you have trusted the supplier, carrier or your own staff to minimize the exposure risk?

There are no easy answers as to how we can educate customers about the foods we produce and serve, but not having the correct information could turn a label into a libel issue, or worse, for the individual consuming that food. We trust that the foods we consume are safe, unadulterated and honestly presented. A comprehensive risk analysis conducted in a “farm-to-fork” format takes more than the eyes of the employees, supervisors, and managers. But how much information is enough and what lengths are necessary to adequately protect and inform customers of potential allergens and adverse reactions during a meal? EHA can provide expert guidance.

With up to 15 million Americans having food allergies, catering to the needs of these prospective customers at your food establishment can save your business from harmful repercussions and potentially even draw in new customers. Unless you are an expert in conducting regular risk assessments, you need to have an additional set of eyes that can focus on the risks in the facility that may have been overlooked on a routine basis. Operations personnel may be too close to the problems to objectively recognize the risk you have in the kitchen. EHA has this type of expertise and focus.

C6

The EHA Advantage

“Over 100 years of cumulative experience in the food industry.”



The staff at EHA Consulting, with over 100 years of cumulative experience in the food industry, is posed to conduct a risk assessment and complete a remediation plan focused on your business’s allergen risk.

Our areas of expertise have covered a vast scope of food manufacturing from “farm-to-fork”, including packaging.

Call us today at 800-969-1441 for more information.