

BVPPH Newsletter to our Food Establishments

BVPPH – Blackstone Valley Partnership for Public Health

Representing the Towns of Blackstone, Douglas, Hopkinton, Mendon, Millville, Northbridge, Upton and Uxbridge
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Dear Newsletter Recipient,

Welcome to the 2nd Quarterly Newsletter from the Blackstone Valley Partnership for Public Health for 2024! This quarter's newsletters deals with a critically important topic: the role of a food establishment in protecting members of their clientele from severe and dangerous allergic reactions. This newsletter will discuss the FDA's Big Nine Allergens (i.e., the most commonly encountered allergens), how to protect your customers from potential exposure, and how to train your staff and prepare your establishment to make it as safe as possible for all of your clientele, regardless of types or presence of allergies.

Allergens

The FDA, as of January 2023, defines nine groups of food as “major allergens.” Major allergens refers to a classification of food items that are (relative to other types of food) commonly associated with allergic reactions, particularly those which may be life-threatening. These nine are as follows: peanuts, tree nuts, soybeans, milk, fish, crustacean shellfish, eggs, wheat, and sesame. Foods containing these ingredients have a relatively high risk of causing a severe reaction, and thus must be handled accordingly by a food establishment to protect its customers from severe illness.

The Basics

An allergic reaction occurs when the human body interprets an otherwise harmless protein in a food as a hostile “intruder,” and starts up an immune response well in excess of what is warranted. Many allergic reactions are merely unpleasant, creating symptoms such as nausea, wheezing, shortness of breath, hives, itchy rashes, swelling of face/hands/eyes/feet, vomiting, diarrhea, abdominal pain, or an itchy throat.

However, some allergic reactions can produce a life-threatening condition called anaphylaxis, which is when the throat swells shut in response to an allergen and cuts off a person's airways. Anaphylaxis is a serious medical condition that, if not treated, can lead to death. And even the use of an epipen (a shot of epinephrine to counteract an immune system response) is usually only able to temporarily stop an allergic reaction; emergency medical care is always required afterwards. Given the serious nature of anaphylaxis, exposure to allergens should be avoided.

Allergies cannot be cured, although their effects can be treated to some extent. Even then,

however, the treatments never remove the allergy itself, merely treating some of the symptoms that might occur. As a result, the only way to keep someone safe from an allergic reaction is *prevention*. To that end, food establishments should take careful steps to prevent any instance of severe allergic reactions in their customers.

105 CMR 590 (“The Food Code”) has certain minimum requirements for preventing allergic reactions. These include disclosure signage, mandatory training requirements, and labeling requirements based on FDA standards. However, the following newsletter will also tackle more complex strategies to prevent accidental exposure to allergens.

What the Code Requires

There are four subsections of the Food Code that mention allergens, allergic reactions, and the responsibilities of a food establishment with respect to preventing allergen exposures. They include the following:

- FC 2-101.11(C9): This section describes that a food protection manager should be able to identify the Big Nine allergens and the common symptoms of an allergic reaction.
- FC 2-103.11(N): This section outlines the responsibility of the person-in-charge (PiC) to ensure that all staff have been properly trained in food safety, including in awareness of allergen handling and prevention of cross-contact (see below).
- FC 3-602.11(B5): This section describes the requirements regarding food labels, and how to notify consumers of what allergens are contained in each product.
- 105 CMR 590.11(C): This section has been added by the State of Massachusetts as an addition to the federal code adopted by 105 CMR 590. It details the requirements for allergy awareness training, the placement of allergy notifications on menus and within establishments, and exemptions to the requirements.

This newsletter will discuss each requirement in some detail. For more information, see the Merged Food Code available at the following URL: mass.gov/doc/merged-food-code-111618/download

Food Safety: Avoiding Cross-Contact

As a food establishment manager, you’ve likely heard of Cross Contamination, which is when one food (such as a raw food product) can drip contaminant or bacteria onto another product (usually a ready-to-eat product). **Cross Contact** is a similar principle, except that it applies specifically to allergens.

Cross Contact occurs when a food or piece of food that comes from an allergen (even the residue from a food item left on a utensil) comes into contact with a food item that doesn’t come from the *same* allergen. For example, if a knife used to spread peanut butter was then used to spread cream cheese, the peanut butter would have created Cross Contact with the cheese.

It is extremely important to prevent Cross Contact, as even a small amount of an allergen can risk making someone dangerously sick. As a food manager or staff member working in a food establishment, you should always be aware of what items on your menu have allergens, and which

of the Big 9 allergens you have on the premises. Once you're aware, you can make certain changes to prevent Cross Contact:

- **Store Separately:** Make sure that foods containing an allergen are separated from all food items that don't contain that same allergen. You also want to make sure that however you store these items, never store them *above* or *directly next to* items that lack that allergen. Sesame seeds can, for example, fall from a bagel and come into contact with pastries stored below it. Therefore, store allergens beneath and away from other food items.
- **Separate Utensils:** There are two ways to prevent Cross Contact when it comes to equipment and utensils. One is to simply wash, rinse, and sanitize any equipment that touches an allergen-bearing food before using it for a food item without said allergen. But an easier way to go about this is to use separate equipment for foods containing allergens. For example, knives used to spread peanut butters could be labeled "peanut butter knives" clearly or be color-coded (such as with an orange handle). Make sure your staff are trained to understand any strategies you use. And when you do clean these separate, allergen-contaminated utensils or equipment, wash them *after* you wash all of your other items, to prevent Cross Contact during the cleaning process.
- **Cook Apart:** If you're cooking items containing allergens, they should be cooked on separate surfaces or in separate equipment than other items. For instance, a grease fryer used to fry shrimp should not then be used to fry up chicken nuggets. Use separate equipment whenever possible. If that is impossible, either cook any allergen-containing food last, or else thoroughly clean (wash, rinse, sanitize, and allow to air dry, and replace grease or other mediums used for cooking) the equipment that has been exposed before using it for any other purpose.
- **Be Aware of What You Touch:** If you touch an allergen-containing food, be careful! You could contribute to Cross Contact if you don't wash your hands thoroughly before moving onto a different task. If you're wearing gloves while handling allergen-containing food, make sure to remove them safely and wash your hands before putting on a fresh pair before moving on to food items that don't contain that specific allergen.
- **Know Your Menu:** At least one person on shift at any specific time should know what food items on your menu contain what allergens. If a customer asks you about what allergens a food item contains, don't guess! Consult with someone about the menu item, and suggest the customer order another item if the item with the allergen cannot be modified to remove said allergen.
- **Bring Them Out Separate:** Bring out any meals for customers that identify that they have a food allergy separately, to ensure that there is no Cross Contact between their meal and the meals of others. It's best to bring their food out first and apart from the other orders.
- **Consider Substitutions:** Make sure you, as a food manager, consider means of substituting ingredients that are major allergens if requested by a customer, or have alternatives ready.
- **Keep a Sign:** All food establishments are required to have an easily readable sign on all menus and menu boards, reminding customers that if they or anyone in their party has a food allergy, they should notify their server before placing an order. If a customer tells you that they have a food allergy, take this seriously! Make sure you follow the instructions above to protect them from possible exposure.

- **Train, Train, Train:** Make sure all of your staff are fully trained to understand, identify, and work with allergens. Have a clear allergen management plan that staff are aware of and well versed in, so that everyone is on the same page. Make sure to reinforce to staff often how important preventing Cross Contact or accidental exposure is, and that failure to do so can lead to putting someone in a life-threatening situation. As in all things, modeling proper behavior for your staff can make adhering to your management plan easier. If you aren't following your own rules, why should your staff?
- **Label Your Items:** Make sure that any food you package in your establishment has all of the ingredients clearly labeled in descending order by weight. If any of the ingredients are or contain one of the Big Nine allergens, make sure to disclose this on your label.

Conclusion

Allergic reactions can be intense and frightening. For your customers, they can be life-threatening. However, a properly trained staff can help reduce the likelihood of someone being exposed to an allergen. Make sure every staff member is well trained in how to prepare food, recite recipes, and understand cross contact. Ensure that your establishment has adequate signage to inform customers of potential allergens, and when in doubt, suggest a customer try an alternate meal where the risk is lower. Allergies can be serious, yes. But with care, they are imminently preventable.

Blackstone Valley Partnership for Public Health - BVPPH

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