



April 12, 2017

To: City of Toronto Licensing and Standards Committee

Councillor Cesar Palacio, Chair  
Councillor Jim Karygiannis, Vice Chair  
Councillor Jon Burnside

Councillor Glenn De Baeremaeker  
Councillor Frank Di Giorgio  
Councillor Frances Nunziata

Sent via email: [lsc@toronto.ca](mailto:lsc@toronto.ca)

Dear Committee Members,

**Re: Motion MM27.29, Investigating Mandatory Epinephrine Auto-Injectors (EpiPens)  
in Toronto Eateries and Other Multi-Use Public Facilities**

Food Allergy Canada would like to thank committee members for the opportunity to speak to Motion MM27.29. We also thank Councillor Pasternak for bringing the motion forward. Food allergy is one of the leading causes of potentially life-threatening allergic reactions affecting more than 2.5 million Canadians. As a very small amount of a food allergen, when ingested, can cause a serious allergic reaction, avoidance is key to staying safe. Currently, there is no cure for food allergy. (In addition to food, there are allergen risks from medication as well as insect stings.)

As the leading national advocacy and education organization dedicated to supporting, educating and advocating on behalf of Canadians at risk, we are very pleased that the City of Toronto (City) has begun a dialogue on food allergies, including consideration of stock epinephrine in restaurants and other public places. With more than 440,000 people in the Greater Toronto Area alone affected by food allergy, this is an important issue.

**Our organization believes that the management of food allergies is a shared responsibility.**

Individuals with food allergies, and the parents of young children, must take ownership of their medical condition. This means knowing the signs and symptoms of an allergic reaction, always carrying an epinephrine auto-injector (e.g. EpiPen®), and knowing how to use it in the event of an emergency. When dining out, this also means communicating with staff about their food allergies. At the same time, we feel that reasonable community measures can be taken to help reduce risks and accommodate people with food allergies.

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We would like to share our thoughts on the motion being put forth:

**1. Food Allergy Canada is broadly supportive of the motion to explore a policy option for mandatory placement of epinephrine auto-injectors in eateries and potentially other public places.**

“Stock” epinephrine auto-injectors can be used in cases when an individual’s auto-injector is not with them, when a second dose is required, or for a first-time reaction. Research has shown that early administration of epinephrine can reduce the severity of symptoms and improve an individual’s outcome. Proper training on how to identify symptoms of an allergic reaction and how to use the auto-injector are essential and should be included as part of the training provided to staff in eateries and other public places. Quick access and prompt administration of epinephrine may mean the difference between life and death. On occasion, the results can be tragic, as we saw in September 2015. An 18-year-old Ontario university student, who visited a local eatery, accidentally consumed a product which contained her allergen and experienced a fatal reaction; access to epinephrine was not readily available. We are aware of other jurisdictions with stock epinephrine available on their premises, including restaurants (e.g. St. Hubert in Quebec, Ontario and New Brunswick) and public sites such as recreational centres (e.g. Sussex, New Brunswick, The Bell Centre in Quebec). In fact, within a few short months of the launch of the stock epinephrine pilot project in Sussex, New Brunswick in 2015, a life was saved.

Note: The motion mentions Allerject® as an auto-injector option, however this brand is no longer available in Canada.

**2. We recommend that the motion be expanded to ask the City Manager to consider universal training on allergen management for foodservice staff in eateries (including access to ingredient and food preparation information).**

There is both an individual and societal cost to avoidable allergic reactions, and as such, Food Allergy Canada recommends that the City examine the safe management of food allergies more broadly in Toronto eateries. Similar to training required for other food safety measures, there should also be allergen training, so that management, kitchen, and service staff are aware of the seriousness of food allergies and what can be done to manage them safely. It is critical for people with food allergies to have access to information they need to make an informed choice when dining out.

In summary, Food Allergy Canada supports the development of policy based on solid evidence and broad consensus to help save the lives of those with food allergies, including residents and visitors to the City. As food allergies represent a food safety issue, we believe that the City’s regulatory and educational approach should address these items above, which reflect a comprehensive review of the effective management of food allergies in eateries and other public places.

We would welcome the opportunity to work with the City on making dining out safer for these individuals and increasing public awareness. We have resources for foodservice training and have been involved in a stock epinephrine pilot project in collaboration with the City of Hamilton, McMaster University researchers and Jackson Square Mall launched in 2014. Further, we recommend that the City engage other stakeholders such as allergists, the Board of Public Health, the restaurant industry, and others in a respectful dialogue to inform this review. Thank you for this opportunity to share the perspective of our organization, representing the millions of Canadians who live with food allergies and the risk for anaphylaxis each day.

Sincerely,



Laurie Harada  
Executive Director



Beatrice Povolo  
Director, Advocacy & Media Relations