

April 12, 2017

Cesar Palacio, Chair
Municipal Licensing & Standards Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

VIA E-MAIL: lsc@toronto.ca

RE: Item LS18.1 Investigating Mandatory Epinephrine Auto-Injectors (EpiPens) in Toronto Eateries and Other Multi-Use Public Facilities

Dear **Chair and Committee Members,**

On behalf of the Ontario Restaurant, Hotel and Motel Association (ORHMA) members I am writing with regards to the April 18th Agenda Item LS18.1 Investigation Mandatory EpiPens in Toronto eateries and other multi use public facilities.

ORHMA represents 4,000 members and 11,000 establishments across Ontario at both the provincial and municipal levels and in Toronto through the ORHMA Toronto Region. Our members represent a wide range of establishments including fine dining restaurants, local pubs, ethnic, quick service restaurants and trendy foodservice concepts.

We appreciate the motion for the City of Toronto MLS staff to review if restaurants in the city should keep EpiPens on their premises in case of emergency. We strongly encourage this decision to be discussed with our members their staff, legal counsel, insurance companies, doctors and the providers of EpiPens in Ontario. As the review will examine other public spaces, we would recommend including all those who provide food such as schools, hospital cafeterias, movie theatres and grocery stores that provide ready to eat meals on their premises to be included as it is unfair treatment to zero in on restaurants.

We would like to think we could save someone's life by having an EpiPen and we take this matter very seriously. At ORHMA we have partnered with Pfizer Canada and we are committed to voluntarily helping the hospitality industry to be prepared for severe allergic reactions in their establishment.

We also know most people who have life threatening allergies typically carry their EpiPen with them at all times when dining out. We also encourage customers to consider reading an online menu before heading out to dine. Many restaurants post their menus on websites. A customer can choose a restaurant accordingly to avoid allergens and or alert staff. It is important upon arrival at restaurants to make restaurant employees aware of one's food allergy. Many in our industry take food handling very seriously and provide training accordingly.

While the intent of this item is good we have many concerns with the unintentional consequences when implementing this to the many restaurants in our industry that have a significant turnover of staff. We would have serious concerns relating to the required training, administering and storage/shelf life of EpiPens in restaurants. This potential requirement would



lead to a heightened expectation that restaurant employees be trained to identify allergic reactions then to administer epinephrine to a child or adult in a timely matter on their premise. This places much accountability and responsibility on restaurant staff in an already busy environment with many other tasks and regulations to follow.

ORHMA takes this matter seriously and we look forward to further consultation.

We thank you for your time, consideration and commitment to working with Toronto's hospitality industry. Together, we can make a true difference in sustaining and growing Toronto's small businesses. We are available to meet along with ORHMA Toronto Restaurant Owners and Operators to discuss these very important policies.

Yours truly,

A handwritten signature in black ink, appearing to read "Elenis", is positioned below the "Yours truly," text.

Tony Elenis
President & CEO
Ontario Restaurant Hotel & Motel Association