## Restaurant Legislation Tool Kit

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## About FARE

Food Allergy Research \& Education (FARE) is the leading nonprofit organization working on behalf of the 15 million Americans with food allergies, including all those at risk for life-threatening anaphylaxis.

## Mission Statement

FARE's mission is to improve the quality of life and the health of individuals with food allergies, and to provide them hope through the promise of new treatments.

Our work is organized around three core tenets:

- LIFE. Support the ability of individuals with food allergies to live safe, productive lives with the respect of others through our education and advocacy initiatives.
- HEALTH. Enhance the healthcare access of individuals with food allergies to state-of-the-art diagnosis and treatment.
- HOPE. Encourage and fund research in both industry and academia that promises new therapies to improve the allergic condition.



## About Food Allergies

Food allergy is a disease in which the body's immune system mistakenly targets a harmless food protein (an allergen) as a threat. To fight this threat, the body releases histamine and other chemicals, causing symptoms that can range from skin rashes and stomach problems to life-threatening anaphylaxis.

Although a person can be allergic to any food, eight foods (milk, egg, peanut, tree nuts, wheat, soy, fish and shellfish) cause most food allergy reactions in the U.S. Additionally, reports show that sesame allergy prevalence may be increasing. Anyone, at any age, can develop a food allergy, but the impact on children is especially severe. There is no cure or standard treatment to prevent food allergy reactions. Strict avoidance of problem foods is the only way to stay safe.

With the number of people who have food allergies increasing at a significant rate, this potentially fatal condition is a growing public health issue. The numbers tell the story:

- Food allergies affect up to 15 million Americans, including 1 in 13 children - roughly two in every classroom.
- Nearly 40 percent of these children have already experienced a severe or life-threatening reaction.
- According to the Centers for Disease Control and Prevention, the number of children with food allergies in the U.S. increased 50 percent between 1997 and 2011.
- Every three minutes, a food allergy reaction sends someone to the emergency room.
- Caring for children with food allergies costs families nearly $\$ 25$ billion per year.
- Learn more about FARE and food allergies www.foodallergy.org.


## FARE Advocacy

FARE is active in advocacy issues involving school policies, food labeling, restaurant regulations, emergency services and transportation.

FARE works with policymakers at all levels of government on initiatives and laws focused on keeping individuals with food allergies safe. It also gives the food allergy community the opportunity to contribute to making that change happen. Advocates are the life-blood of FARE's advocacy program, delivering a message of awareness, access and safety.

We need you!
You can become an advocate in your community by speaking out and getting involved. Taking action by following the steps in our Restaurant Legislation Tool Kit is just one way for you to contribute.

FARE deeply appreciates your interest in bringing forth positive change for the food allergy community! With your help, we can encourage legislators in your state to pursue legislation that makes dining out at restaurants more safe and enjoyable for the 15 million Americans with food allergies.

There are many ways you can help:

- Write to your legislators. Legislators rely on messages from advocates to judge the importance of pending legislation to their constituents. A sample letter highlighting the importance of food allergy awareness training for restaurants is included on page 7. The letter also notes the availability of the model restaurant bill developed by FARE. For additional information and tips about writing to your legislators, please visit
www.foodallergy.org/advocacy/toolbox/writing-to-legislators.
- Provide your legislator with key information. FARE's position paper on allergen training for restaurants can be found on page 5.
- Share with your legislator the model restaurant bill, found on page 8. This model bill, developed by FARE, provides sample legislation with best practices for restaurants. A one-page summary of the model bill is also included in this Tool Kit on page 11. The summary is designed to be a quick reference tool for both advocates and legislators.
- To support your communication about the importance of allergy awareness in restaurants, a list of suggested talking points is included on page 12.
- Cultivate relationships with legislators and their staff and arrange face-to-face meetings with them. Relationships and meetings are effective ways to directly express your views on food allergy awareness in restaurants. For tips on communicating with legislators, please be sure to refer to FARE's Advocacy Toolbox, available online at www.foodallergy.org/advocacy/toolbox. FARE's Advocacy Toolbox offers helpful guides to build your advocacy skills, communicate the food allergy message and build those critical relationships with key decision makers.

Whichever way you choose to serve, please know it makes a difference. Other opportunities can be explored online at www.foodallergy.org/advocacy.

## FARE Position Statement

Food allergy is a growing public health concern. Fifteen million Americans have food allergies - and they are eager to find restaurants that can accommodate their needs. Eating away from home can pose a significant risk to people affected by food allergy. FARE advocates for the adoption of policies and protocols that require designated restaurant personnel to be trained in food allergy preparedness and available on site during all hours of operation. Other provisions may include but are not limited to: including a notice to patrons on all menus to inform the server about any food allergies; requiring the Certified Food Protection Manager to include allergen awareness in their staff training as part of their standard operating procedures; requiring restaurants to have a procedure to inform customers, upon request, of the presence of major food allergens in menu items; and providing for the Local Public Health Authorities to make available compliance information by maintaining an online source of restaurant inspection scores and valid Certificates of Allergen Awareness Training.

## Supportive Facts

- Research suggests that more than half of fatal food allergy reactions are triggered by food consumed outside the home. ${ }^{1,2,3}$
- According to a survey by the National Restaurant Association, some 87 percent of restaurants believe food allergies are extremely important and expect increased attention to it, yet 43 percent concede they do not train their staff on food allergens. ${ }^{4}$
- Researchers at Auburn University surveyed 110 restaurant managerial staff in the U.S. from both independent and chain restaurants to investigate the levels of awareness and preparedness related to serving customers with food allergies. Among their findings, nearly 22 percent of participants indicated food allergy reactions had occurred at their restaurants in the past year. Also, even though 80 percent of participants indicated they had received training about food allergies, there were wide gaps in knowledge about food allergies. For example, about 40 percent believed that simply removing a food allergen from a plated meal could prevent an allergic reaction. ${ }^{5}$
- Currently the revenue lost from food allergy families avoiding restaurant dining is estimated at $\$ 45$ million each week - more than $\$ 2$ billion annually.
- The global food market for those with food allergies is projected to exceed $\$ 24.8$ billion by $2020 .{ }^{6}$
- The multiplier effect of more than 15 million Americans on restaurant patronage can have a substantial impact on those establishments accommodating the food allergy customer.

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## Response to Issue

- As of August 2016, four states - Massachusetts, Michigan, Rhode Island and Virginia - have enacted laws to improve food allergy safety and awareness in restaurants.
- Designed to make it safer for individuals with food allergies to dine in restaurants, these laws may include provisions like notices on menus asking patrons to inform the server about any food allergies; food allergy training for restaurant managers; and procedures to inform customers, upon request, of the presence of major food allergens in menu items.
- Additionally, there may be laws in place requiring restaurants to display food allergy awareness posters

O Restaurants in Maryland are required to prominently display a food allergy awareness poster in the staff area.
O New York City requires posters with information on food allergy to be placed in food service establishments. The posters have to be available in multiple languages, including but not limited to Chinese, English, Korean, Russian, and Spanish.

O St. Paul, Minnesota requires restaurants to display food allergy awareness posters. The St. Paul poster is modeled after a poster developed by one of FARE's predecessor organizations, FAAN, and a flier created by the Anaphylaxis and Food Allergy Association (AFAA) of Minnesota.

- The Food Code is a summary of the U.S. Food and Drug Administration's (FDA) best advice for uniform systems and practices that address the safety of food sold in food service and certain retail establishments. The 2013 U.S. Food and Drug Administration (FDA) Food Code now includes provisions to improve how restaurants meet the needs of food allergic customers. ${ }^{7,8}$

O According to Section 2-102.11 of the Code, food establishments should have a person in charge during all hours of operation who is knowledgeable about major food allergens, the symptoms of an allergic reaction, and proper cleaning procedures to prevent cross-contact. In addition, the person in charge (according to Section 2-103.11 of the Code) should ensure that employees are properly trained in food safety issues, including food allergy awareness, as it is related to their assigned duties.

O The FDA updates the Food Code approximately every four years. The Code is used by state, city, county, tribal, and territorial agencies to help regulate restaurants, retail food stores, and vending and food service operations in institutions such as schools, hospitals, nursing homes, and child care centers. The 2013 edition of the Code is the eighth edition published by the FDA. The previous version of the Code was released in 2009, and was amended in 2007. Individual states, however, must adopt the Food Code and the status of adoption by state can vary.

- FARE developed the SafeFARE program, which offers tools to help improve the overall experience for dining out with food allergies. The SafeFARE website, available at www.SafeFARE.org, provides information for restaurants in addressing front and back of house risk areas, as well as considerations for consumers when dining out with food allergies. FARE supports two comprehensive national training programs to help restaurant personnel become more food allergy aware, offered in partnership with the National Restaurant Association and MenuTrinfo.

ABOUT FARE Food Allergy Research \& Education (FARE) works on behalf of the 15 million Americans with food allergies, including all those at risk for life-threatening anaphylaxis. This potentially deadly disease affects 1 in every 13 children in the U.S. - or roughly two in every classroom. FARE's mission is to improve the quality of life and the health of individuals with food allergies, and to provide them hope through the promise of new treatments. Our work is organized around three core tenets: LIFE - support the ability of individuals with food allergies to live safe, productive lives with the respect of others through our education and advocacy initiatives; HEALTH - enhance the healthcare access of individuals with food allergies to state-of-the-art diagnosis and treatment; and HOPE - encourage and fund research in both industry and academia that promises new therapies to improve the allergic condition. For more information, please visit www.foodallergy.org and find us on Twitter @FoodAllergy, Facebook, YouTube, and Pinterest.

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# Letter of Introduction to Legislator Template 

Date<br>Your Name<br>Your Address<br>Your City, State, Zip Code<br>Your E-mail<br>Your Phone Number<br>The Honorable Legislator's Name<br>Chamber<br>Office Address

Dear Legislator,
Food allergies are a growing public health issue with an estimated 15 million Americans affected. For these individuals, even a trace amount of an allergen can result in a reaction which may be life-threatening. Dining in restaurants is especially challenging for individuals with food allergies who must constantly guard themselves against accidental exposure, especially in a venue where food is being prepared by individuals who are unfamiliar with food allergies.
(Share a brief story about your experiences dining out with food allergies and/or why restaurant legislation is important to you.)

Individuals with food allergies and their families are often reluctant to dine out if they are unsure that a restaurant can accommodate their needs. While the food allergy community recognizes that training and education do not guarantee safety, training can help to decrease the risk of accidental exposure to the allergen. This in turn may encourage those affected by food allergies to consider dining out. Training and food allergy awareness is the necessary next step we must take to create safer, more enjoyable dining out experiences for all. The National Restaurant Association estimates that restaurants lose an estimated $\$ 45$ million a week in potential revenue. Restaurants that cater to individuals with food allergies may increase their revenue by a noticeable percentage.

In response to the growing need for food allergy awareness in the restaurant industry, Food Allergy Research \& Education (FARE) developed educational resources as well as model restaurant bill language that intends to increase food allergy awareness among restaurant personnel for safer dining experiences for patrons.

Key components of this model language include:

- Adding allergen awareness training requirements for a Certified Food Protection Manager.
- Requiring restaurants to include on all printed menus and menu boards a clear and conspicuous notice requesting a customer notify the server, before placing an order, about the customer's allergy to a major food allergen.
- Requiring restaurants to have a procedure in place for informing customers of the presence of major food allergens in menu items, upon customer request.

I respectfully urge you to review FARE's Model Bill Language and Position Statement and to consider introducing this very important legislation. Thank you for your consideration.

Sincerely, Your Full Name

## Allergen Awareness \& Training in Restaurants: Model Bill Language

Amends (insert applicable state code) to promulgate standards for a food allergy awareness program that requires that every restaurant (1) include on all menus a notice to the customer of a customer's obligation to inform the server about any food allergies; and (2) require all Certified Food Protection Manager(s) employed by a restaurant to successfully complete an approved training and assessment to ensure knowledge in regard to relevant issues concerning food allergies as they relate to food preparation. These rules provide guidelines for the relationship among the (insert regulatory authority), Local Public Health Authorities and Training Program Providers.

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1.0 Definitions
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## SECTION 1.0 - DEFINITIONS

1.1 "Certified Food Protection Manager" means an employee who has supervisory and management responsibility and the authority to direct and control food preparation and service and who has shown proficiency of required information through passing a test that is part of an accredited program.
1.2 "Restaurant" means an establishment substantially engaged in the business of preparing and serving food intended for immediate consumption either on or off the premises. This may include a full service restaurant, fast food restaurant, take out only restaurant, institutional cafeteria in a non-food service setting (such as within a hospital, cultural institution, college or university, office building); food court; café; luncheonette; grill; tearoom; sandwich shop; soda fountain; ice cream parlor; tavern; bar; cocktail lounge; night club; private, public or nonprofit organization or institution routinely serving food; catering kitchen; and commissary or similar place in which food or drink is prepared for sale or for service on the premises or elsewhere.
1.3 "Major Food Allergen" means (1) milk, eggs, fish (such as bass, flounder or cod), crustaceans (such as crab, lobster or shrimp), tree nuts (such as almonds, pecans or walnuts), wheat, peanuts, and soybeans; and (2) a food ingredient that contains protein derived from a food named in subsection (1). This does not include any ingredient that is exempt under the petition or notification process specified in the federal Food Allergen Labeling and Consumer Protection Act of 2004 (Public Law 108-282).
1.4 "Menu" means a printed or pictorial display of a food item or items and their price(s) that are available for sale from a restaurant. This includes menus distributed or provided outside the establishment and promotional items that include menu information from which a customer can place an order, including menus published on an establishment's web site.
1.5 "Menu Board" means any list or pictorial display of a food item or items and their price(s) posted within or outside a restaurant.
1.6 "Approved Training Provider" means a training provider that has been approved by the (applicable state's Department of Health) to provide training and assessment of allergen awareness for food service managers.

## SECTION 2.0 - GENERAL REQUIREMENTS

2.1 All certified food protection managers shall complete allergen awareness training and pass an assessment from an Approved Training Provider to obtain a Certificate of Allergen Awareness Training by (insert date) or prior to or within (insert \# of days) after his or her hire date. At least one certified food protection manager shall be on site during all hours of operation.
(1) Training. Have all Certified Food Protection Manager employed by the restaurant complete allergen awareness training and pass an assessment from an Approved Training Provider and obtain a Certificate of Allergen Awareness Training by (insert date) or prior to or within (insert \# of days) after his or her hire date. The Certified Food Protection Manager shall include allergen awareness in staff training and include procedures for the handling of patrons with food allergies as part of his/her standard operating procedures.
(2) Notice on printed menus and menu boards. Such restaurants shall include on all printed menus and menu boards a clear and conspicuous notice requesting a customer notify the server, before placing an order, about the customer's allergy to a food allergen. The notice shall state: Before placing your order, please inform your server if a person in your party has a food allergy.
(a) Effective Date. The notice must be included on printed menus and on indoor and outdoor menu boards, including drive-through menu boards, no later than (insert date).
(b) All notices on menu boards must be easily readable from the point of service at which food is ordered. On the menu board itself, the font size of the notice must be equal to or greater than the font size of the smallest menu item listed on the menu board.
(c) In lieu of placing the notice directly on the indoor or outdoor menu board itself, the food establishment may post the notice adjacent to the menu or at each point of service where food is ordered. Such notice must be securely posted in a manner so that it may be easily seen and read from a distance of five feet by a person standing at or approaching the point of service, shall directly face the purchaser, and shall not be obstructed from view.
(3) Procedures. Restaurants shall have a procedure in place for informing customers of the presence of major food allergens in menu items, upon customer request.

## SECTION 3.0 - FOOD ALLERGEN AWARENESS TRAINING

3.1 By (insert date), restaurants shall have on staff at least one Certified Food Protection Manager who has been issued a Certificate of Allergen Awareness Training by an Approved Training Provider as qualified by (insert regulatory authority). The certificate will be valid for three (3) years.
3.2 Managers are required to:
(1) demonstrate knowledge of Major Food Allergens by posting the Food Allergen Awareness Training Certificate issued by an Approved Training Provider;
(2) ensure that designated employees are properly trained in food allergy awareness as it related to their assigned duties by taking a training course by an Approved Training Provider at least every three years; and
(3) ensure that at least one manager with a Certificate of Allergen Awareness Training is on site during all hours of operation.

## SECTION 4.0 - CERTIFICATE RENEWAL

4.1 Certificates of Allergen Awareness Training shall be renewed at minimum every three (3) years by completing an Allergen Awareness training course and successfully passing the assessment from Approved Training Provider as qualified by (insert regulatory authority).

## SECTION 5.0 - COMPLIANCE

5.1. A restaurant shall retain records on site documenting compliance of its certified food protection manager(s) with the allergen training. The (insert regulatory authority) shall enforce this subsection in the same manner that it enforces other provisions related to certified food protection managers.
(1) Local Public Health Authorities shall maintain an online source of restaurant inspection scores and note the restaurant's possession of a valid Certificate of Allergen Awareness Training.

## Summary of FARE's Model Restaurant Bill Language

## Content

Food allergies are a growing public health issue with an estimated 15 million Americans affected. For these individuals, even a trace amount of their allergen can result in an allergic reaction, with reactions ranging from a mild response to anaphylaxis, a severe and potentially fatal reaction. Dining in restaurants is especially challenging for individuals with food allergies who must constantly guard themselves against accidental exposure, especially in a venue where food is being prepared by individuals who are unfamiliar with food allergies.

In response to the growing need for food allergy awareness in the restaurant industry, Food Allergy Research \& Education (FARE) developed a model restaurant bill that intends to increase food allergy awareness among restaurant personnel for safer dining experiences for patrons. The bill seeks to amend the state's code as it relates to restaurant employees, training in food safety and food allergy awareness to do the following:

- All Certified Food Protection Managers employed by a restaurant shall complete allergen awareness training and pass an assessment to obtain a Certificate of Allergen Awareness Training. The Certified Food Protection Manager(s) shall include allergen awareness in staff training and include procedures for the handling of patrons with food allergies as part of their standard operating procedures.
- Restaurants will retain records documenting allergen training compliance of its Certified Food Protection Manager(s).
- In a clear, conspicuous manner, restaurants' menus and/or menu boards will include a request for customers to notify the server, before placing an order, about the customer's food allergy.
- Restaurants will have a procedure in place for informing customers, upon request, of the presence of major food allergens in menu items.
- Local Public Health Authorities will make note, online, of restaurants' possession of a valid Certificate of Allergen Awareness Training in conjunction with restaurant inspection scores.


## Impact

The bill would have minimal fiscal impact on state or local governments. The state's regulatory authority would be required to approve allergen training programs for restaurants.

Local public health departments, in their capacity as inspectors, would be required to confirm compliance to the requirements outlined in this bill and make that information accessible to the public. The anticipated requirements align with local health departments current duties, and will not result in a significant financial burden.

Restaurants in the state may see a positive financial impact as the bill may lead to more patrons with food allergies dining out. Currently, the revenue lost from food allergy families avoiding restaurant dining is estimated at $\$ 45$ million per week. In addition, the global food market for those with food allergies is projected to exceed $\$ 24.8$ billion by $2020 .{ }^{9}$

[^2]
## Suggested Talking Points: The Case for Food Allergy Restaurant Legislation

The information below may help guide your conversation with the elected officials you engage:

## About Food Allergies

- Food allergy is a serious medical condition affecting up to 15 million people in the United States, including 1 in 13 children. ${ }^{10,11,12}$
- Although nearly any food is capable of causing an allergic reaction, eight foods account for the majority of all food allergy reactions in the United States. These foods are peanut, tree nut, milk, egg, wheat, soy, fish, and shellfish.
- The number of people who have a food allergy is growing. According to a study released in 2013 by the Centers for Disease Control and Prevention, food allergy rates among children increased approximately 50 percent between 1997 and $2011 .{ }^{13}$
- Every three minutes, a food allergy reaction sends someone to the emergency department - that is that is more than 200,000 emergency department visits per year. ${ }^{14}$
- Reactions can range from mild to severe, including the potentially life-threatening condition known as anaphylaxis.


## Food Allergies in the Restaurant Setting

- Eating away from home can pose a significant risk to people affected by food allergy. Research suggests that more than half of fatal food allergy reactions are triggered by food consumed outside the home. ${ }^{15,16,17}$
- Findings from a 2015 study suggest that restaurants may be underestimating the severity of food allergies. ${ }^{18}$
- Restaurant employees generally receive little or no training on the serious nature of food allergy; how to read ingredient labels; the importance of strict allergen avoidance; and how to avoid cross-contact during food preparation.
- Potential areas of risk include cross-contact with allergens either in the kitchen or supply chain, incomplete knowledge of ingredients by staff, lack of communication between diner and staff, and medically inaccurate information about food allergy severity.

[^3]
## The Restaurant Industry

- The impact of food allergies is both a challenge and opportunity for the food service industry. According to a survey by the National Restaurant Association, some 87 percent of restaurants believe food allergies are extremely important and expect increased attention to it - yet 43 percent concede they do not train their staff on food allergens. ${ }^{19}$
- Currently, the revenue lost from food allergy families avoiding restaurant dining is estimated at $\$ 45$ million per week. In addition, the global food market for those with food allergies is projected to exceed $\$ 24.8$ billion by $2020 .{ }^{20}$


## Making a Difference

- As of 2016, Massachusetts, Michigan, Rhode Island, and Virginia have all passed state laws designed to make it safer for individuals with food allergies to dine in restaurants. Although the laws vary by state, they all require allergy awareness training for the restaurant's food protection managers. ${ }^{21}$

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[^0]:    1 Bock SA, Muñoz-Furlong A., Sampson H. Further fatalities caused by anaphylactic reactions to food, 2001-2006. J Allergy Clin Immunol. 2007; 119(4): 1016-8.
    2 Bock SA, Muñoz-Furlong A, Sampson HA. Fatalities due to anaphylactic reactions to foods. J Allergy Clin Immunol. 2001; 107(1): 191-3.
    3 Sampson HA, Mendelson L, Rosen J. Fatal and near-fatal anaphylactic reactions to food in children and adolescents. N Engl J Med.1992; 327(6): 380-4.
    4 National Restaurant Association-commissioned survey by Product Evaluations, 2012
    5 Lee YM, Xu H. Food allergy knowledge, attitudes, and preparedness among restaurant managerial staff. J FoodServ Bus Res. 2015; 18(5): 454-469.
    6 Food Allergy and Intolerance Products - A Global Strategic Business Report. Global Industry Analysts, Inc., 2016.

[^1]:    7 Food Code, 2013 Recommendations of the United States Public Health Service, Food and Drug Administration, National Technical Information Service Publication PB2013-110462. See sections 2-102.11 and 2-103.11, Management \& Personnel. www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ UCM374510.pdf. Accessed August 30, 2016.
    8 Supplement to the 2013 Food Code, National Technical Information Service Publication PB2015-104921. www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/UCM451981.pdf. Accessed August 30, 2016.

[^2]:    $\overline{9 \text { Food Allergy and Intolerance Products - A Global Strategic Business Report. Global Industry Analysts, Inc. } 2016 . ~}$

[^3]:     niaid.nih.gov/topics/foodallergy/research/pages/reportfoodallergy.aspx.
    11 United States Census Bureau Quick Facts (2015 estimates).
     rics 2011; 128(1):e9-17.
     cdc.gov/nchs/products/databriefs/db121.htm
     2011; 127(3): 682-683.
    15 Bock SA, Muñoz-Furlong A., Sampson H. Further fatalities caused by anaphylactic reactions to food, 2001-2006. J Allergy Clin Immunol. 2007; 119(4): 1016-8.
    16 Bock SA, Muñoz-Furlong A, Sampson HA. Fatalities due to anaphylactic reactions to foods. J Allergy Clin Immunol. 2001; 107(1): 191-3.
    17 Sampson HA, Mendelson L, Rosen J. Fatal and near-fatal anaphylactic reactions to food in children and adolescents. N Engl J Med. 1992 ; 327(6): 380-4.
    18 Lee YM, Xu H. Food allergy knowledge, attitudes, and preparedness among restaurant managerial staff. J FoodServ Bus Res. 2015 ; 18(5): $454-469$.

[^4]:    19 National Restaurant Association-commissioned survey by Product Evaluations, 2012
    20 Food Allergy and Intolerance Products - A Global Strategic Business Report. Global Industry Analysts, 2016.
    21 www.foodallergy.org/advocacy/restaurants

