

# Undeclared Allergen Risk In Foodservice: A Case Study And Prevention

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FOOD SAFETY  
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## Why Undeclared Allergen Risk Is High In Foodservice

Undeclared allergens in foodservice are a high-consequence chemical hazard because foodservice products—especially in QSR and fast-casual—are typically produced and packaged for immediate consumption, and most food wrappings/menu boards do not provide ingredient lists or precautionary/advisory statements. That differs from retail packaged foods where consumers can often review ingredients and advisory statements (e.g., “manufactured in a facility that also processes peanuts and sesame”). Therefore, there must be constant focus with suppliers to ensure they are providing products that do not have an undeclared allergen.

The public health impact is significant: food allergies affect an estimated 15 million people in the United States, causing roughly 30,000 Emergency room visits, 150–200 deaths annually, and nearly half of all fatal reactions are attributed to food from restaurants/foodservice establishments. The net result of this risk is

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that a foodservice business must have a robust focus on supplier preventive controls and buyer verifications to protect consumers that eat at their establishments.

## CASE STUDY

### “Circus Burger” LTO Milkshake With Candy-Coated Pecans (And Undeclared Peanuts)

A QSR chain (“Circus Burger”) launched a limited-time only (LTO) milkshake using a new candy-coated pecan ingredient. Because the milkshake

## THE 14 FOOD ALLERGENS



Gluten / Wheat



Crustaceans



Eggs



Fish



Peanuts



Soybeans



Milk



Tree Nuts



Celery



Mustard



Sesame




E-X  
Sulfites



Shellfish



Lupins



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beverage cup nor menu post would include avoidance messaging beyond the product name, the company needed assurance there were no undeclared allergens in the ingredient because the candy-coated pecans were going to be produced in a facility where the manufacturer also used peanuts in production. The buyer/spec approach included a supplier food safety specification to ensure no cross contact of peanuts in its candy-coated pecans, and additional verification testing for specification compliance that included:

- Onsite rapid testing to confirm equipment was free of peanuts after cleaning/sanitation, and before any candy-coated pecans were processed.
- Testing for peanut protein on every lot of finished candy-coated pecan product, supported by a hold-and-release protocol.

After rollout of the new product, sales were strong—but in week three, the health department notified the corporate office that an 11-year-old child died following an anaphylactic reaction to the new milkshake. The product was traced back to the candy-coated pecans; the child was allergic to peanuts (not tree nuts). Testing confirmed peanut protein was present in the candy-coated pecan ingredient, and the corporate office stopped all sales of the LTO product systemwide. An

investigation of the root cause of the undeclared allergen found multiple systemic gaps:

- Although pre-processing allergen swabbing and testing was performed, corrective actions weren't consistently executed or recorded when positives occurred, and final product testing wasn't always performed for all lots.
- The supplier treated positive test results as an internal facility issue only (CAPA focused on cleaning/sanitation), rather than fully interrogating upstream ingredient risk causing any positives.
- Critically, the supplier and corporate office did not implement data analytics and notifications sufficient to verify spec compliance lot-by-lot -allowing untested product to be delivered to restaurants.

### **Practical Takeaway For Prevention**

If a food manufacturing business processes ingredients with allergens (e.g., peanuts) in a facility where a foodservice ingredient/product is being made but the foodservice business desires an allergen free ingredient (i.e., no undeclared allergens) and does not plan to declare the possible allergen to its customer, then influencing

that product to be run on dedicated non-allergen equipment or a dedicated room/line is the best method to avoid cross-contact. If the product must be processed on shared equipment, then dedicating certain days to specific allergen-containing products is also a good way to reduce risk. However, in these cases there must be a robust changeover program involving cleaning and sanitation to remove the undeclared allergens from the last production run. This process should be detailed and executed properly to ensure that residues are removed and will not transfer to other products. An effective allergen swabbing program to verify the absence of undeclared allergens should be used as the verification process to provide confidence through data that any undeclared allergen residues are removed.

Final product testing for high-risk items (e.g., those made in a facility on the same production line that is used to process allergen ingredients) ensures the lowest risk of undeclared allergens and adds the final touch to a complete and robust

program to ensure that a safe food product has been made. Testing a sample size that gives the best confidence in methodology and training of staff must be agreed upon and committed to. However, if the foodservice business does choose to require the supplier to test each lot of final product, it must ensure that notifications and data analytics are in place to track each lot of product results during the hold and release period, and enable this data reporting in real time during manufacturing and distribution of the ingredient to ensure no product is released into distribution that has either not been tested or has tested positive. Otherwise, the scenario in our fictitious case above is much more probable.

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**Contact ACTIVE FOOD SAFETY for more information or help with prevention of undeclared allergens in foodservice.**

