



## **Coeliac Australia Gluten Free Standard for the Australian Food Service Sector**

### **BACKGROUND**

#### **PART A – Gluten Free Standard Requirements**

The Gluten Free Standard for the Australian Food Service Sector (Standard) is described in Part A of this document. The purpose of the Standard is to establish a food service best practice for the safe sourcing, preparation and service of gluten free (GF) foods. The scope of this Standard is specific to GF items and requires food service providers to have policies and procedures in place to eliminate the risk of gluten cross contamination in all stages of food handling.

The proposed policies and procedures are outlined in this document. Food service providers are encouraged to apply this Standard to promote consumer confidence in seeking GF food options. In many instances, the burden to achieve requirements proposed in this Standard is likely to be minimal. It is likely that many requirements of this Standard will already be in place and compliance to this Standard will be readily achieved through the demonstration of documentation of system requirements and records.

#### **PART B – Gluten Free Accreditation Program Requirements**

The Coeliac Australia Gluten Free Accreditation Program (GFAP) is described in Part B of this document. The GFAP provides participants with the opportunity to differentiate their GF menu items and to promote consumer confidence in their establishment.

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## List of abbreviations used

ATP	Adenosine Triphosphate (Testing kit)
CA	Coeliac Australia
CAMSG	Coeliac Australia Marketing and Style Guide
ELISA	Enzyme-Linked Immunosorbent Assay
FSANZ	Food Standards Australia and New Zealand
FSMS	Food Service Management System
GF	Gluten Free
GFAP	Gluten Free Accredited Program
HACCP	Hazard Analysis Critical Control Point
LFD	Lateral Flow Device
NATA	National Association of Testing Authorities – Australia
PPE	Personal Protection Equipment
Provider	Food Service Provider
Standard	Coeliac Australia Gluten Free Standard for the Australian Food Service Sector

## Part A: Gluten Free Standard Requirements

The Standard has a specific focus on the protocols essential for the provision of GF foods. These are in addition to the foundation and regulatory principles for provision of safe food, which are outlined in Section 1 and include, for example, the expectation of this Standard that food service providers are compliant to regulatory food service requirements, such as:

- Food Standards Australia New Zealand (FSANZ)
- Applicable State and Territory Regulations
- Implemented and documented robust Hazard Analysis Critical Control Point (HACCP) Food Safety Management System. Ideally (but not mandatorily) it has been or is working towards being independently certified by an Approved Third Party Certification Body. Note: For participants in the GFAP certified HACCP Certification is a mandatory requirement.

The specific protocols deemed essential for the provision of GF foods unique to this Standard are outlined in Sections 2, 3 and 4. These three key principles identified to reflect the different activities undertaken by food service providers in the provision of GF meals are:

- Section 2: **Sourcing requirements** for GF ingredients and products
- Section 3: **Segregation requirements** for storage, food handling, display and plating
- Section 4: **Service requirements** for communication throughout all stages of service from description of menu items and all stages of food preparation through to customer service.

Accurate and effective communication and traceability throughout the process of GF meal service is an underlying and integral feature of these Sections. Such communication and traceability includes but is not limited to: developing an allergen menu matrix, writing of menu description, receipt of the order and service of the GF meal to the intended customer.

In the following Sections 1-4, details of the Standard's Foundation, Sourcing, Segregation and Service Requirements are listed, together with an explanation of the intent of each section.

For compliance with the Gluten Free Standard please note:

- All *mandatory* requirements listed in Sections 1-4 must be met
- *Best practice criteria* are also indicated to provide additional guidance.

## Section 1 – Foundation Requirements

The following requirements are considered fundamental to GF food preparation.

### 1.1 Food Safety Management System and Commitment to GF Standard

*Intent: To ensure that food service providers meet regulatory requirements for notification as a food business and that minimum system requirements for the GF Standard are defined.*

The food service provider shall demonstrate a commitment to the Standard through a documented Food Safety Management System (FSMS), based on CODEX HACCP which has been implemented. The FSMS shall detail how the provider complies with the Standard.

1.1	MANDATORY REQUIREMENTS
MR 1.1.1	The provider shall comply with Food Standards Australia New Zealand (FSANZ) Food Standards Code Chapter 3: Food Safety Standards
MR 1.1.2	The provider shall comply with applicable State and Territory Regulations
MR 1.1.3	The provider shall conduct a GF risk assessment of its establishment in terms of risk of cross contamination in the environment (e.g. heavily floured)
MR 1.1.4	A nominated Food Safety Supervisor will be appointed for the site
MR 1.1.5	The provider shall have a documented FSMS in place, based on CODEX HACCP, detailing how the provider complies with the Standard. If participating in the Gluten Free Accreditation Program, documentation detailing compliance with and the Coeliac Australia Marketing and Style Guide (CAMSG) is also required
MR 1.1.6	The HACCP plan shall include assessment and management of gluten contamination as a potential hazard in raw materials and for each applicable process step

### 1.2 Document and Record Controls

*Intent: Food Service Providers are required to have documented system requirements that are legible, current and available for use by staff. Records demonstrating retrospective compliance to the GF system will be retained and readily retrievable.*

Documentation may include hardcopy or electronic documentation. Examples of typical documentation may include approved supplier program, Standard Operating Procedures, Good Manufacturing Practices, Allergen Control Policy, Product Specifications, Recipes, GF menu (in-house and take away) or menu

matrix (*refer to Appendix 1*) and training programs. Obsolete documents and forms shall be removed from operational use.

Compliance with HACCP will also ensure that typical records required to be retained may include, but not limited to, records for: supplier approval, goods received inspections, cleaning, training, audit reports and corrective actions.

1.2	<b>MANDATORY REQUIREMENTS</b>
MR 1.2.1	A procedure to manage documents including policies, procedures and work instructions covering the requirements of this standard shall be in place
MR 1.2.2	Documents shall be current (up-to-date), reviewed and updated regularly, and easily accessible at the point of use as required
MR 1.2.3	Procedures and work instructions shall be clearly documented in English. Documentation may include the use of photographs to assist staff where appropriate. If needed, translated copies in an appropriate language to maximise staff understanding are permitted
MR 1.2.4	Records shall be retained for a minimum of 12 months to demonstrate retrospective compliance with GFAP requirements

### **1.3 GF Ingredients, Menu and Recipes**

*Intent: Suitable GF ingredients, menu options and accompanying recipes are identified by the provider.*

The GF menu may be determined by an informed and knowledgeable person working within the organisation or by an external technical expert. It is an expectation that the GF menu options will offer GF consumers a choice across the menu for entrée, main meals, desserts and snacks.

1.3	<b>MANDATORY REQUIREMENTS</b>
MR 1.3.1	An approved GF product/ingredient list shall be developed
MR 1.3.2	Recipes for all GF menu items shall be documented. Where GF is an alternative option to the regular menu, a separate recipe must be available highlighting the appropriate alternative GF ingredients and methods to maintain the GF status of the meal
MR 1.3.2	A Menu Allergen Matrix or List shall be completed for each meal item, noting each individual ingredient, allergens present in the ingredients and allergen source. <i>Refer to Appendix 1</i>
MR 1.3.3	All GF meals shall be prepared in accordance with the recipe using products/ingredients from the approved GF product list
MR 1.3.4	GF menu options shall be determined by a person(s) with appropriate knowledge and understanding of GF requirements

MR 1.3.5	Documented accurate GF menu options (menu, menu matrix ( <i>Appendix 1</i> ) or list) shall be available and easily accessible for reference by wait staff and/or customers
MR 1.3.6	Disclaimers on GF items indicating potential for gluten cross contamination or contradicting the GF claim are not considered GF and shall not be used
MR 1.3.7.	The menu shall only make reference to items/meals being 'gluten free'. No other claim in reference to gluten may be used
MR 1.3.8	A menu item marked 'gluten free' shall only be prepared using GF ingredients
MR 1.3.8	Ingredients sourced to prepare GF menu items shall be routinely reviewed to ensure continued GF status
MR 1.3.9	For menu items that can be adapted to a GF option (e.g. poached eggs on toast made GF by use of GF toast), wait staff shall prompt the customer to confirm if they require the GF or non-GF version of this menu item
<b>BEST PRACTICE</b>	
BP 1.3.1	Separate GF menu should be provided indicating GF menu items only
BP 1.3.2	In the event that there are GF and non GF menu options with the same name, unique names should be used (e.g. GF fruit bread vs. non GF raisin toast)
BP 1.3.3	GF kitchen staples such as corn starch, icing mixture, boosters, stocks or soy milk should be utilised across the entire kitchen

#### 1.4 Food Handler Hygiene

*Intent: Food handler hygiene has the potential to cross contaminate GF ingredients, work areas and equipment; therefore suitable controls to prevent contamination shall be implemented.*

In addition to food handler hygiene requirements defined in the FSMS to ensure appropriate personal hygiene to prevent microbiological contamination of food, the provider shall also define specific controls to prevent cross contamination between GF food and sources of gluten contamination.

<b>1.4</b>	<b>MANDATORY REQUIREMENTS</b>
MR 1.4.1	Hands shall be washed prior to handling GF foods at all times, to prevent cross contamination from the handling of gluten containing foods
MR 1.4.2	Aprons shall be changed when visibly soiled with gluten containing ingredients such as flour and breadcrumbs
<b>BEST PRACTICE</b>	
BP 1.4.1	Visually distinct protective wear (disposable aprons and gloves) in a contrasting colour should be used to clearly differentiate GF food handling activities

## 1.5 Cleaning Program

*Intent: Cleaning equipment and practices have the potential to cross contaminate GF ingredients, work areas and equipment; therefore suitable controls to prevent contamination shall be implemented.*

In addition to cleaning requirements defined in the FSMS to ensure appropriate cleaning standards are maintained to prevent microbiological contamination of food, food service providers shall also define specific cleaning activities to prevent cross contamination between GF food and sources of gluten contamination. This shall include a documented program detailing the following:

<b>1.5</b>	<b>MANDATORY REQUIREMENTS</b>
MR 1.5.1	Documentation shall outline the method of cleaning including cleaning equipment (brushes, scourers, cloths etc.) to be used and any chemicals required. NOTE: Suitable cleaning equipment requires the use of 'clean' cleaning equipment which is not visibly soiled with gluten containing food debris, e.g. to clean benches that are heavily soiled with flour or breadcrumbs, wipe down with wet paper towel and then wipe over with cleaning equipment. Ensure cleaning equipment is free of debris before next use; alternatively use disposable cloths for maintaining good allergen control
MR 1.5.2	Documentation shall outline the frequency of cleaning including sequence of cleaning to avoid recontamination of clean equipment
MR 1.5.3	Documentation shall include appointment of person or position responsible for the supervision of cleaning tasks
MR 1.5.4	Documentation shall outline the acceptable standard of cleaning required including inspection points on equipment to confirm cleaning has been effective to remove residual gluten containing products (e.g. flour and breadcrumbs in crevices or equipment requiring dismantling to clean). This includes inspection of wares after cleaning to ensure no product residues remain
MR 1.5.5	Documentation shall outline cleaning of equipment used for GF food preparation prior to other equipment or use of dedicated wash cycles for GF equipment. This shall include ensuring that dishwashers are free from residue and do not retain any water from previous cycles
MR 1.5.6	A record of cleaning shall be retained
	<b>BEST PRACTICE</b>
BP 1.5.1	Colour coded protective clothing, equipment and cleaning equipment should be used as a visible indicator of GF food preparation
BP 1.5.2	Swabbing program (such as ATP) should be implemented to verify cleaning methods are effective in removing trace protein residues to prevent potential cross contamination



## 1.6 Training Program

*Intent: All staff involved with the production and service of GF meals to have successfully completed training to ensure the integrity of the Standard requirements are understood and effectively implemented.*

Food Service Providers shall have an appropriately detailed training program to ensure that staff involved with the production and service GF meals have the necessary knowledge to ensure compliance to the GF standard. Training may be in hardcopy or electronic format. *NOTE:* For organisations participating in the GFAP who already have existing online training material, the content of such training material must be included in the Document Review Audit process to determine if the existing training program is eligible for exemption from Coeliac Australia online Gluten Free Food Service training program.

<b>1.6 MANDATORY REQUIREMENTS</b>	
MR 1.6.1	All staff shall have successfully completed GF training and/or refresher training based on CA Gluten Free Standards
MR 1.6.2	Records/Certificates of training shall be provided to indicate when staff have completed training, the content and duration of the training material and an assessment to confirm understanding and competency of staff
<b>1.6 BEST PRACTICE</b>	
BP 1.6.1	All staff should successfully complete and hold a current certificate in the <i>Coeliac Australia online Gluten Free Food Service training program</i>

## 1.7 Corrective Action System

*Intent: All cases of non-compliance with the Standard, whether they are detected by internal or external audits or by operational failures, shall be addressed to prevent recurrence.*

<b>1.7 MANDATORY REQUIREMENTS</b>	
MR 1.7.1	Procedures shall be implemented detailing actions to be taken in the event of a gluten contamination incident; this includes service of non-GF meal to a customer. The corrective action shall require identification of the non-compliance, identification of the root cause of the problem, short term corrective action and the long term corrective action(s) to prevent recurrence
MR 1.7.2	A non-compliance register shall be established indicating non-conformance, the date of non-conformance, recommended corrective action, corrective action undertaken by provider, responsibility for corrective action, proof of rectifying non-conformance and timeframe for closure

<b>BEST PRACTICE</b>	
BP 1.7.1	CA should be advised of any non-compliance incidence
BP 1.7.2	CA should be advised when corrective action has been taken for any non-compliance incidences

## Section 2 – Sourcing

### 2.1 Sourcing of ingredients and products:

*Intent: All GF ingredients and finished products shall be assessed for their suitability prior to purchase to prevent contamination or service of non GF menu items. All sourcing documentation including approved supplier listing, recipes and menus are required to be reviewed and updated when there are changes to suppliers or products to ensure currency and accuracy of information.*

2.1	<b>MANDATORY REQUIREMENTS</b>
MR 2.1.1	Providers shall ensure compliance with FSANZ Standard 1.2.3 – 4 .1 (b) (i) Mandatory to list or notify of cereals containing gluten, namely, wheat, rye, barley, oats and spelt and their hybridised strains other than where these substances are present in beer and spirits NOTE: The exception of those products that contain no detectable gluten such as wheat glucose syrup, caramel colour from wheat (additive 160) or dextrose from wheat
MR 2.1.2	All ingredients and products shall contain no disclaimers relating to gluten content. Products with precautionary or advisory statements that contradict the GF claim (e.g. 'made on the same line as wheat or gluten', 'may contain traces of gluten or wheat') are not considered to be GF and shall not be permitted as a GF product
MR 2.1.3	All ingredients shall contain no fermented or malted ingredients or products from gluten containing grains
MR 2.1.4	In the case of alcohol, where ingredients are not identified, the product shall be verified to be GF by manufacturer
MR 2.1.5	A Product Specification Sheet from manufacturer or supplier shall be provided for all recipe ingredients and finished (ready to eat) products that are served/itemised in the menu with a 'Gluten Free' claim. Where an ingredient or product is GF by ingredient, (such as plain yoghurt, canned tomatoes etc.) and is packaged with a declaration of ingredients, a separate Product Specification Sheet is not required
MR 2.1.6	Where a finished (ready to eat) product is purchased from a wholesale supplier (such as cakes, desserts, prepared meal components etc.), an up to date product specification verifying the GF status of the product shall be provided
MR 2.1.7	The provider shall have a system to be informed of changes to the GF status of ingredients/products purchased

MR 2.1.8	In the event that a new ingredient (for trial of a new recipe etc.) is required at short notice from an unapproved supplier, this shall be recorded and addressed as an exception in the approved supplier program
MR 2.1.9	Listing of GF approved suppliers shall include supplier's name, food item, date of first transaction with supplier, contact name and contact details
<b>BEST PRACTICE</b>	
BP 2.1.1	Ingredients used to make GF menu options should be laboratory tested to show 'no detectable gluten'

### Section 3 – Segregation

*Intent: Effective segregation is required to be maintained at all stages of food handling from preparation (thawing, washing, cutting, mixing), cooking, cooling, transfer, reheating and service as applicable to the product and process to prevent cross contamination between gluten containing and GF ingredients.*

#### 3.1 Receipt of GF Products

*Intent: A purchasing policy for GF ingredients is required to ensure the integrity of GF ingredients is maintained.*

Prior to the acceptance of GF ingredients and products, an assessment shall be completed as follows:

3.1	MANDATORY REQUIREMENTS
MR 3.1.1	The assessment shall verify that the product ordered is approved and is provided by an approved supplier <b>(No substitutions of ingredients or products are permitted)</b>
MR 3.1.2	The assessment shall include implementation of a process to routinely check label information to confirm GF status
MR 3.1.3	The assessment shall include inspection of any GF product received in damaged packaging to determine if the product has been contaminated and if so, the product shall be rejected or disposed of

### 3.2 Storage of GF Products

*Intent: All ingredients and finished products (dry, refrigerated, frozen) shall be stored so as to prevent cross contamination from gluten containing ingredients. This may include segregated storage by location, storage in sealed containers or storage of GF ingredients and products above non GF products to prevent cross contact in the event of a breakage or spillage.*

As a minimum this shall include;

3.2	MANDATORY REQUIREMENTS
MR 3.2.1	All GF ingredients shall be clearly labelled so as to prevent the accidental use of gluten containing alternatives in a GF recipe. This includes any ingredients or meal components considered to be work in progress (WIP) e.g. pesto mix not yet made into a pasta sauce
MR 3.2.2	The traceability of GF status shall be maintained for an ingredient or products that are decanted or removed from original packaging (e.g. thickeners such GF maize starch and gluten containing wheaten corn starch)
MR 3.2.3	All GF products shall be labelled and stored on a dedicated shelf in the store/refrigeration area, above all gluten containing foods
MR 3.2.4	All GF ingredients shall be sealed or covered during storage and transfer to prevent any incidental cross contamination
<b>BEST PRACTICE</b>	
BP 3.2.1	GF ingredients should be stored separately

### 3.3 GF Food Preparation and Handling

*Intent: The use of protective clothing, food handling equipment and cleaning equipment and practices shall be considered as a risk for gluten cross contamination.*

Controls shall be implemented to reduce the risks identified for potential gluten cross contamination. Scheduling of GF production shall be assessed in conjunction with concurrent activities that are likely to occur in the food preparation area. This may include the potential for airborne contamination which may occur in environments that use gluten containing flours as 'flour dust' which may settle on work areas, benches and utensils and be a source of cross contamination.

3.3	MANDATORY REQUIREMENTS
MR 3.3.1	Effective operational controls shall be in place to prevent cross contamination at all stages of food storage, preparation, holding, display, plating and service.
MR 3.3.2	Utensils, equipment and work areas used in the preparation of GF foods shall be clean, with no product residue from gluten containing products

MR 3.3.3	Work Area: A clean work area that has been thoroughly cleaned immediately prior to GF food preparation activities shall be used for GF food preparation
MR 3.3.4	Utensils: Clean utensils, dedicated utensils and Personal Protection Equipment (PPE) shall be used for GF food preparation. There shall be no sharing of utensils with utensils used for gluten containing products e.g. butter, spreads and condiments
MR 3.3.5	Cooking equipment: Clean equipment such as pots and pans, colanders/strainers shall be used for GF food preparation
MR 3.3.6	Deep fryers and immersion cooking: A dedicated deep fryer shall be used for GF items, due to the high risk of contamination from oil used for gluten containing items. All immersion cooking shall use a dedicated GF or clean vessel with fresh liquid
MR 3.3.7	Toasters and sandwich press: All toasted items shall be adequately wrapped (e.g. Bonbon style) if sharing a sandwich press with gluten containing ingredients to avoid risk of cross contamination. All GF toast shall be prepared in a dedicated toaster or wrapped in a sandwich press as there is high risk of cross contamination due to crumbs
MR 3.3.8	Grills: An area of the grill shall be dedicated for GF food preparation to ensure gluten containing foods do not touch or come into contact during simultaneous cooking
MR 3.3.9	Ovens/Pie warmers: Top shelf shall be dedicated to GF products to prevent cross contamination from overflow of gluten containing products
MR 3.3.10	Rotisserie: GF products shall not to be cooked at the same time as gluten containing products on revolving rotisseries. If utilising a vertical rotisserie, top level shall be dedicated to GF products to avoid cross contamination from dripping
MR 3.3.11	Sandwich/Burger/Pizza Preparation lines: GF fillings/toppings shall be segregated from gluten containing foods including breads/rolls/pizza bases and their crumbs
MR 3.3.12	Probe thermometers shall be thoroughly cleaned prior to being inserted into GF foods to ensure there is no incidental cross contamination
<b>BEST PRACTICE</b>	
BP 3.3.1	Work Area: A designated GF work area should be used
BP 3.3.2	Utensils: Colour coded utensils should be available exclusively for use in GF food preparation activities
BP 3.3.3	Colour coded protective clothing, equipment and cleaning equipment should be used as a visible indicator of GF food preparation
BP 3.3.4	Toasters and sandwich press: Dedicated GF toasters and sandwich press should be available

### 3.4 GF Food Display

*Intent: Food display practices shall be considered as a risk for gluten cross contamination.*

3.4	
MANDATORY REQUIREMENTS	
MR 3.4.1	All GF items shall be displayed on top shelf in display cabinets and clearly labelled. All GF items shall be displayed on separate plates and not touching any gluten containing foods.
MR 3.4.2	Dedicated serving utensils shall be used for GF products. Replenishment of GF items shall also be completed using dedicated food utensils
MR 3.4.3	GF foods displayed in a Bain Marie shall be located in the front section closest to the customer's view to prevent gluten containing foods being lifted over GF foods
MR 3.4.4	All garnishes on GF items shall be GF (e.g. icing sugar dusted onto cakes, croutons on soups/salads etc.)
BEST PRACTICE	
BP 3.4.1	All GF items should be displayed utilising visually distinct indicators for GF meals such as differently shaped or patterned plates, meal flags or product packaging to ensure the integrity of GF meals during all stages of food preparation

## Section 4 – Service

*Intent: The food service provider requires a system to verify that meal service protocols are defined to ensure customer service is effectively managed to validate that the right person receives the intended order.*

### 4.1 Meal Service Protocols

*Intent: All staff shall be informed and trained in procedures on GF food ordering, preparation, handling and service requirements. Meal service protocols clearly identify GF orders through all stages of communication from the customer request for a GF meal, to wait staff, through to the kitchen and vice versa. Visibility, accuracy and traceability of information are paramount in this requirement. This applies to all forms of menu ordering including hardcopy orders and electronic orders collected with tablets etc.*

4.1	
MANDATORY REQUIREMENTS	
MR 4.1.1	All staff shall be able to accurately answer queries from customers requesting GF menu items, to confirm GF status of products and permissible substitutions of GF ingredients to convert a gluten containing meal to a GF meal
MR 4.1.2	A copy of the GF menu options or menu matrix ( <i>refer to Appendix 1</i> ) shall be displayed in the kitchen or in a readily accessible area for wait staff to refer to as a ready reference to confirm the gluten status of items

MR 4.1.3	Staff shall repeat order back to customer to confirm the order meets customer requirements
MR 4.1.4	GF requests shall be clearly documented on order docket
MR 4.1.5	Clear communication protocols from front to back of house shall be in place for GF orders. A docket/ticket shall be generated for each GF order and accompany the order throughout preparation through to delivery. When leaving the kitchen, GF meal shall be identified by an obvious visual cue to indicate GF status
MR 4.1.6	Procedures shall be in place to ensure gluten garnishes are not placed on GF meals
MR 4.1.7	Wait staff shall confirm GF meal when delivering to the customer
<b>BEST PRACTICE</b>	
BP 4.1.1	Electronic ordering system with 'point of sale' exclusions programmed against specific menu items should be used. (e.g. If order placed for GF pepperoni pizza, this displays as an invalid order if it is not possible to order this as a GF menu item, or where GF meal is adapted, there should be a list of items not to be included in order i.e. croutons, bread roll etc.)
BP 4.1.2	GF order should be delivered separately to gluten containing menu options to ensure right meal is delivered to the intended customer, e.g. GF meals packed in separate take away box/bag, served on different trays or individually delivered to customer
BP 4.1.3	Regular analytical product testing of GF menu items should be conducted to verify GF status. All results should show 'nil detectable gluten'

## Part B: Coeliac Australia Gluten Free Accreditation Program

All food service providers wishing to participate in the Coeliac Australia Gluten Free Accreditation Program (GFAP), hereafter referred to as 'Applicant', must comply with the Standard requirements, as outlined in PART A, Sections 1-4.

Application forms and fee structure can be obtained directly from Coeliac Australia (CA). A summary of the process to become accredited with the GFAP is as follows:

### **GFAP Process:**

#### **Stage 1 - Documentation Review / Gap Audit – Off-site**

This assessment of the Applicant's FSMS is conducted off-site and evaluates the Applicant's operations against the Standard for the purpose of determining if the Applicant is suitable to proceed through to an on-site audit (Stage 4) and participate in the GFAP.

The average timeframe for Stage 1 is approximately one to two weeks after the relevant documents are received by CA. The process may be lengthened by either party if additional information is required to be gathered and incorporated into existing documentation.

The documentation review /gap audit is conducted by a CA-appointed Auditor.

#### **Stage 2 – Gluten Free Menu Verification**

CA will nominate selected menu items (from the list of menu items provided in Stage 1) that are to be laboratory tested for the presence of gluten. CA will also nominate the number of items and the frequency of testing to verify the Applicant's GF claims.

*GF Food Analysis* – All samples are required to undergo laboratory testing from a National Association of Testing Authorities – Australia (NATA) accredited laboratory. Associated costs are the responsibility of the Applicant. The testing procedure used must be an enzyme linked immunosorbent assay (ELISA) test of the lowest possible limit of detection used in the industry. The current levels are 3-5ppm. Lateral Flow Device (LFD) testing is NOT acceptable.

#### **Stage 3 – On-site Compliance Audit**

After completion of Stages 1-2, audits are then conducted on-site and are an assessment against the Standard for the purpose of monitoring compliance with the GFAP. All documentation provided in Stage 1 must be readily available to the Auditor to assist with the on-site Compliance Audit.



This on-site Compliance Audit must take place within usual operational hours, as the auditor must witness the process of order taking, food storage, preparation, handling, display and service to the customer.

Although the scope of the on-site audit will be based on the GF Standard, any observations made relating to unsafe food handling practices may be noted.

A typical GF on-site audit will take approximately two hours. This involves an on-site assessment of the site storage, preparation, display and service conditions, compliance to Standard Operating Procedures (SOPs) / work instructions, communication protocols, menu matrix records and food handler hygiene. In the event that all activities are not able to be observed, site staff may be requested to describe or demonstrate how an activity would be completed. This will be at the discretion of the CA-appointed Auditor.

*Laboratory Results* – Results of analytical product testing requested by CA in the Stage 2 shall be available to the auditor. All results should show 'no detectable gluten'.

*Audit Outcomes* – If during the audit, any non-compliant areas are identified that have an impact on the integrity of the GFAP, corrective action is required. Corrective action is described on the next page. The impact on accreditation and the level of corrective action is dependent on the severity of the non-compliance identified. Follow up audit activities to review and close non-compliances will be at the cost of the Applicant.

*Audit Frequency* – The frequency of audit will be based on the audit outcome and audit grade assigned. Audit grading and compliance definitions are described on the next page.

#### **Stage 4 – Gluten Free Symbol Licence**

Licence Agreement – Once CA has been advised that the Auditor is satisfied that the Applicant is compliant with the GF Standard a CA Licence Agreement will be issued. The use of the trademarked GF symbol is subject to adhering to the guidelines outlined in the CA Marketing and Style Guide document. The Certificate of Accreditation is also issued at this time.

## Corrective action

The required corrective action time frame will be dependent on the non-compliance identified. There are three classifications of non-compliance applicable: critical, major and minor as defined in this document. Observations may also be reported at the discretion of the CA-appointed Auditor.

## Audit Grading

Audit Grade	Critical Non Compliance	Major Non Compliance	Minor Non Compliance	Corrective Action	Audit Frequency
A			<10	Objective evidence within 30 days	12 months
B			11 – 15	Objective evidence within 30 days	12 months
B		1	<10	Objective evidence within 30 days	12 months
C			15 – 20	Objective evidence within 30 days	6 months
C		3	<15	Objective evidence within 30 days	6 months
D	1	>3	>20	Certification not granted – reaudit required	NA

**Critical Non-Compliance:** Where there is a serious system or operational failure by the applicant that is likely to cause an immediate consumer risk. As gluten is an allergen, any breach allowing contamination with gluten will be considered critical. *Examples:*

- Gluten detected in laboratory testing for a product indicated as GF
- Breach of the mandatory guidelines in Part A resulting in food that is not suitable or safe for consumption
- Breach of Food Standards Code resulting in food that is not suitable or safe for consumption
- Major breach of CAMSG including use of trademark used on non-audited/non-approved products for GF consumption

*Audit Outcome:* On site audit with one (1) or more critical non-compliances – Accreditation to GF Standard not granted until corrective actions taken and successful on site re-audit completed. This will typically require a retest of GF food.

If there is a critical non-compliance identified during a renewal audit, accreditation will be suspended until the critical non-conformance has been addressed and the applicant re-audited.

**Major Non-Compliance:** Where there is a significant system or operational deficiency demonstrating the GF Standard has not been fully documented or implemented by the business. *Examples:*

- HACCP plan does not include assessment of gluten contamination as a potential hazard
- Staff training in GF food handling and service not completed
- Procedures specific to GF food handling and service not documented

*Audit Outcome:* On-site audit with more than three (3) major non-compliance - Accreditation to GF Standard not granted until corrective actions taken and verified by CA appointed Auditor. *(This will generally be through submission of corrective action evidence and assessment off site).*

**Minor Non-Compliance:** Where GFAP requirements have not been fully met however there is minimal impact on the overall compliance to system or operational requirements. *Examples:*

- Minor trademark reproduction breach
- Minor breach of CAMSG

*Audit Outcome:* On-site audit with minor non-compliance (less than 20) - Accreditation to GF Standard granted pending timely corrective actions taken and verified by CA appointed Auditor. *(This will generally be through submission of corrective action evidence and assessment off site).*

**Audit Observation:** Food safety issue outside of scope of GF depending on severity; this may require further reporting and discussion pending decision on outcome of certification to GF Standard.

## Appendix 1

### Example Menu Allergen Matrix

<b>Organisation name:</b> ABC Restaurant								
<b>Food safety supervisor:</b> A. Person								
<b>Date of review:</b> January 2015					<b>Date of new review:</b> When ingredients or menu changes			
<b>Menu Item</b>	<b>Gluten Free Pasta with chicken and pesto sauce</b>							
<b>Menu components</b>	<b>Gluten</b>	<b>Milk/Dairy</b>	<b>Egg</b>	<b>Peanut</b>	<b>Treenut</b>	<b>Fish/Seafood</b>	<b>Soy</b>	<b>Sesame</b>
Gluten Free Pasta - xyz Gluten Free Pasta								
Pesto sauce					√ - Pinenuts			
Chicken Fillets								
Parmesan Cheese		√						
Green Salad with Italian dressing - mixed lettuce leaves, olive oil, mustard and white vinegar								
Chicken - breasts diced								
Garnish - shallot curls								
Status	Gluten Free, contains dairy and treenuts							
Substitution (required?)	Omit Parmesan cheese for a GF Dairy free version							