

BACKGROUND

Gluten Free Standard Requirements

The purpose of the Coeliac Australia Gluten Free Standard for Australian Food Service Providers (GF Standard) is to establish food service best practice for the safe sourcing, preparation and service of gluten free (GF) food. The scope of this GF Standard is specific to GF menu items and requires food service businesses to have policies and procedures in place to eliminate and manage the risk of gluten cross contamination in all stages of food handling to meet the Food Standards Australia New Zealand Code (FSANZ) definition of 'gluten free'.

Food service businesses are encouraged to apply this best practice when offering GF food options. It is likely that many requirements of this GF Standard will already be in place and compliance will be readily achieved meeting the needs of the 1 in 70 Australians living with coeliac disease.

Gluten Free Standard Rationale

The GF Standard has a specific focus on the protocols essential for the provision of GF foods. These requirements are in addition to the regulatory requirements for the provision of safe food, which are outlined in the following standards:

- Food Standards Australia New Zealand (FSANZ) Food Safety Standard 3.2.2 - Food safety practices and general requirements
- Applicable State and Territory Regulations

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

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

Accurate and effective communication and traceability throughout the process of GF meal service is an underlying and integral expectation of the GF Standard.

In the following Sections 1-4, the 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.

The Gluten Free Standard will be regularly reviewed and will be subject to changes from time to time in accordance with changes from FSANZ and in consultation with the food service industry.

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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
Business	Food Service Business
GF Standard	Coeliac Australia Gluten Free Standard for Australian Food Service Providers

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 businesses meet regulatory requirements for notification as a food business and that minimum system requirements for the GF Standard are defined.*

The food service business must demonstrate achievement of minimum food safety requirements through ongoing satisfactory compliance with FSANZ Chapter 3 - Food Safety Standards. The intent of this GF Standard requires that the Food Service Business assesses their ability to meet the requirements through a risk based assessment of all food handling activities completed by the business. Not all food business will have the capability to provide a suitable work environment for the handling of GF foods.

1.1	MANDATORY REQUIREMENTS
MR 1.1.1	The business must be registered as a food business in the applicable state or territory.
MR 1.1.2	The business must maintain a satisfactory audit result from the local authority and proactively address any food safety compliance issues identified.
MR 1.1.3	The business must conduct a GF risk assessment of its establishment in terms of risk of cross contamination in the environment (e.g. heavily floured work areas, shared equipment etc.)
BP 1.1.1	Self-audit every three months to ensure practice is maintained and staff are efficient in their knowledge and working behavior.

1.2 Document and Record Controls

Intent: *Documented information is required to be current and readily available for use by staff. Records demonstrating retrospective compliance to the GF Standard need to be retained and readily retrievable.*

Documentation may include hard copy or electronic records. Examples of typical documentation may include approved GF ingredients, Standard Operating Procedures and Work Instructions, Product Specifications, Recipes, GF menu (in-house and take away) or Menu Matrix (*refer to Appendix 1*) and training programs. Obsolete documents and forms must be removed from operational use.

1.2	MANDATORY REQUIREMENTS
MR 1.2.1	Documented information, (hard or soft copy ingredient specifications, recipes, menus, standard operating procedures, work instructions, menu matrix, training programs), must be reviewed and updated regularly, and easily accessible at the point of use as required.
MR 1.2.2	Documented information, (as outlined in MR 1.2.1) must be documented in the language appropriate to the staff working at the business. Documentation may include the use of photographs to assist staff where appropriate.

MR 1.2.3	Documented information including records must be retained for a minimum of 12 months to demonstrate retrospective compliance to the GF Standard. This may include but is not limited to; ingredient specifications, standardised recipes, menus, foodservice standard operating procedures and work instructions, records of training, results of an independent product testing etc.
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1.3 GF Ingredients, Menu and Recipes

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

The GF menu may be determined/formulated by an informed and knowledgeable person working within the organisation or by an external technical expert such as a dietitian. 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	MANDATORY REQUIREMENTS
MR 1.3.1	A GF product/ingredient list must be developed
MR 1.3.2	Recipes for all GF menu items must be documented. Where GF is by request as 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 1.3.3	All GF meals must be prepared following a standardised GF recipe.
MR 1.3.4	GF menu options must be determined/formulated by a person(s) with appropriate knowledge and understanding of GF as defined by FSANZ and by the requirements as stipulated in this standard.
MR 1.3.5	Documented accurate GF menu options (menu, menu matrix (<i>Appendix 1</i>) or list) must 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 must not be used.
MR 1.3.7.	The menu must only make reference to items/meals being 'gluten free'. No other claim in reference to gluten may be used, (e.g. low gluten, coeliac friendly etc.).
MR 1.3.8	A menu item marked 'gluten free' must be prepared using only GF ingredients and following protocols to avoid gluten contamination.
MR 1.3.9	Ingredients sourced to prepare GF menu items must be routinely reviewed or whenever changes are made to the source or supplier to ensure continued GF status.
MR 1.3.10	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 must prompt the customer to confirm if they require the GF or non-GF version of this menu item.
	BEST PRACTICE
BP 1.3.1	GF kitchen staples such as corn (maize) starch, icing sugar mixture, boosters, stocks, soy milk, etc. should be utilised.

BP 1.3.2	A Menu Allergen Matrix or List must be completed for all menu items, noting individual ingredients and other allergens present (e.g. dairy, tree nut etc.) to ensure accuracy of information provided to consumers. <i>Refer to Appendix 1</i>
BP 1.3.3	For menu items that can be adapted to a GF option e.g. raisin toast, name the gluten free version another name to avoid confusion e.g. GF fruit toast.

1.4 Food Handler Hygiene

Intent: Food handler hygiene protocol is essential to prevent cross contamination of GF ingredients, work areas and equipment.

In addition to food handler hygiene requirements defined in regulatory requirements, the business must implement effective practices to prevent cross contamination of GF food with gluten.

1.4	MANDATORY REQUIREMENTS
MR 1.4.1	Hands must be washed or gloves changed prior to handling GF foods
MR 1.4.2	Aprons and/or clothing must be changed when visibly soiled with gluten containing ingredients such as flour and breadcrumbs.
	BEST PRACTICE
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 must be implemented.

The business must define specific cleaning activities to prevent cross contamination of GF food with gluten.

1.5	MANDATORY REQUIREMENTS
MR 1.5.1	Cleaning utensils, (e.g. brushes, scourers, cloths etc.) and cleaning methods must ensure that shared equipment and work areas are maintained to a high standard of hygiene to prevent cross contamination with gluten.
MR 1.5.2	Utensils, crockery and cutlery must be visibly clean after manual washing or after being washed in a domestic/commercial dishwasher. Any items with visible food residue must be re-cleaned.
MR 1.5.3	Equipment that is hard to clean such as blenders, colanders and food processors require inspection after cleaning to confirm removal of gluten containing residues (e.g. flour and breadcrumbs in crevices or equipment requiring dismantling to clean).
MR 1.5.4	Work areas must be thoroughly cleaned prior to use for GF food handling. NOTE: To clean benches that are heavily soiled with flour or breadcrumbs, wipe down with wet paper towel to remove the

	majority of the soiling and then wipe over with cleaning items or alternatively use disposable cloths to prevent cross contamination from cleaning practices.
BEST PRACTICE	
BP 1.5.1	Colour coded cleaning equipment should be used as a visible indicator of GF food preparation cleaning equipment and work areas.
BP 1.5.2	A swabbing program (such as an ATP hygiene monitoring system) should be implemented to verify cleaning methods are effective in removing trace protein residues to prevent potential cross contamination.
BP 1.5.3	For equipment hard to clean (e.g. blenders, colanders, sieves) consider the use of equipment specifically designated to gluten free use only.

1.6 Training Program

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

Food Service Business must provide an effective training program to ensure that staff involved with the production and service of GF meals have the necessary knowledge to ensure compliance with the GF Standard.

1.6	MANDATORY REQUIREMENTS
MR 1.6.1	All staff must be trained and assessed in the business policies and practices specific (Standard Operating Procedures) to the GF Standard to ensure they have the knowledge and competency required for GF foodservice.
MR 1.6.2	The training material content and assessment activities to confirm understanding and competency of staff must be retained.
MR 1.6.3	Records/Certificates of training must be documented to demonstrate staff have completed training.
BEST PRACTICE	
BP 1.6.1	All staff should successfully complete and hold a current certificate in <i>Coeliac Australia online Gluten Free Food Service training program</i> .
BP 1.6.2	Include GF training in new staff induction material.

1.7 Corrective Action System

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

1.7	MANDATORY REQUIREMENTS
MR 1.7.1	Procedures must be implemented detailing actions to be taken in the event of a gluten contamination incident; this includes service of a non-GF meal to a customer ordering gluten free. The corrective action must require identification of the root cause of the problem, short term corrective action and the long term corrective action(s) to prevent recurrence

Section 2 – Sourcing

2.1 Sourcing of ingredients and products:

Intent: All GF ingredients and finished products must 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	MANDATORY REQUIREMENTS
MR 2.1.1	<p>All GF ingredients and products must be compliant as defined by FSANZ:</p> <ul style="list-style-type: none"> • Standard 1.2.3 – 4: Mandatory declaration of certain foods or substances in food • Standard 1.2.7 – 13: Nutrient content claims • Schedule 4-3: Gluten Free Definition <p>SUPPORTING DOCUMENTATION: The Coeliac Australia Ingredient List booklet provides specific information on an extensive listing of food ingredients.</p>
MR 2.1.2	<p>All ingredients and products must not contain disclaimers relating to gluten content. Products with precautionary or advisory statements that contradict the GF claim. For example, the following on a gluten free product are not permitted: Made on the same line as gluten, barley, rye, oats or wheat. May contain traces of gluten, barley, rye, oats or wheat. Products using these disclaimers are not considered to be GF and must not be permitted as a GF ingredient.</p>
MR 2.1.3	<p>As per FSANZ All GF ingredients must not contain:</p> <ul style="list-style-type: none"> • Barley • Rye • Oats • Wheat • Any of the above grains as hybrids or derivatives (exceptions include glucose syrup, caramel colour (150) and dextrose derived from wheat) • Any of the above grains malted, fermented or enzymatically treated i.e. malt barley.
MR 2.1.4	<p>In the case of beer and cider, where ingredients are not identified, the product must be verified to be GF by manufacturer.</p>
MR 2.1.5	<p>A Product Specification Sheet from manufacturer or supplier must be obtained for all recipe ingredients used in menu items identified as 'Gluten Free'. 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. Raw, fresh produce e.g. fruit and vegetables that are naturally gluten free are exempt.</p>
MR 2.1.6	<p>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 must be provided.</p>

MR 2.1.7	The business must have a documented communication system to ensure all staff are informed when there is a change to GF status of ingredients/products purchased.
MR 2.1.8	In the event that a new ingredient (for trial of a new recipe, change in supplier, change in budget, change in availability of ingredients etc.) is required at short notice, this must be recorded and addressed as an exception in the approved ingredient program.
MR 2.1.9	Listing of GF approved ingredients must include supplier's name, food item, date of first transaction with supplier contact name and Product Specification Sheet.
MR 2.1.10	All GF ingredients sourced or manufactured out of Australia must be identified and verified as meeting FSANZ standard for GF.

Section 3 – Segregation

Intent: Effective segregation is 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 of GF ingredients with gluten.

3.1 Receipt of GF Products

Intent: Effective practices for GF ingredients are required to ensure the integrity of GF ingredients is maintained.

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

3.1	MANDATORY REQUIREMENTS
MR 3.1.1	The assessment must verify that the product received is the approved product ordered. (No substitutions of ingredients or products are permitted)
MR 3.1.2	The assessment must include implementation of a process to routinely check label information to confirm GF status of the product e.g. no change to ingredients or manufacturing processes.

3.2 Storage of GF Products

Intent: All ingredients and finished products (dry, refrigerated, frozen) must 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.

3.2	MANDATORY REQUIREMENTS
MR 3.2.1	All GF and gluten containing ingredients must 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 must 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 must be labelled and appropriately packaged to prevent contamination with gluten containing ingredients during storage.
MR 3.2.4	All GF ingredients must be sealed or covered during storage and transfer to prevent any incidental cross contamination
BEST PRACTICE	
BP 3.2.1	All GF products shall be labelled and stored on a dedicated shelf in the store/refrigeration area, above all gluten containing foods, in a separate section of the kitchen, in a separate/designated pantry or store cupboard.

3.3 GF Food Preparation and Handling

Intent: The use of protective clothing, food preparation area, cleaning equipment and practices must be considered as a risk for gluten cross contamination.

Controls must be implemented to reduce the risks identified for potential gluten cross contamination. Scheduling of GF production must 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' may settle on work areas, benches and utensils and be a source of cross contamination.

3.3	MANDATORY REQUIREMENTS
MR 3.3.1	Effective controls must be in place to prevent cross contamination of GF foods with gluten at all stages of food storage, preparation, holding, display, plating and service.
MR 3.3.2	Utensils and equipment used in the preparation of GF foods shall be clean, with no product residue from gluten containing products. There must be no sharing of utensils used for gluten containing products (e.g. butter, spreads and condiments).
MR 3.3.3	A thorough clean down of preparation area immediately prior to GF food preparation activities when a dedicated GF area is not available.
MR 3.3.6	Deep fryers and immersion cooking: A dedicated deep fryer must be used for GF items, due to the potential risk of contamination from oil used for gluten containing items. All immersion cooking must use a dedicated GF or clean vessel with fresh liquid.
MR 3.3.7	Toasters and sandwich press: All toasted items must 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 must be prepared in a dedicated toaster or wrapped in a sandwich press to avoid cross contamination with crumbs.
MR 3.3.8	Grills: An area of the grill must be dedicated for GF food preparation to ensure gluten containing and gluten free foods do not come into contact during simultaneous cooking.

MR 3.3.9	Ovens/Pie warmers: Top shelf must be dedicated to GF products to prevent cross contamination from overflow of gluten containing products. Ensure that commercial oven fans are not on when gluten containing and GF foods are sharing oven space.
MR 3.3.10	Rotisserie: GF products must not to be cooked at the same time as gluten containing products on revolving rotisseries. If utilising a vertical rotisserie, top level must be dedicated to GF products to avoid cross contamination from dripping.
MR 3.3.11	Sandwich/Burger/Pizza Preparation lines: GF fillings/toppings must be segregated from gluten containing foods including breads/rolls/pizza bases and their crumbs.
MR 3.3.12	Probe thermometers used to check food temperatures during cooking or display must be thoroughly cleaned prior to being inserted into GF foods to ensure there is no incidental cross contamination between gluten containing and GF foods.
BEST PRACTICE	
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 must be considered as a risk for gluten cross contamination.

3.4	MANDATORY REQUIREMENTS
MR 3.4.1	All GF items must be displayed on top shelf in display cabinets and clearly labelled. All GF items must be displayed on separate plates and not touching any gluten containing foods.
MR 3.4.2	Dedicated serving utensils must be used for GF products. Replenishment of GF items must also be completed using dedicated food utensils.
MR 3.4.3	GF foods displayed in a Bain Marie must be located in a position to prevent gluten containing foods being lifted over/falling into GF foods.
MR 3.4.4	All garnishes on GF items must 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 business requires a system to ensure that the right person receives the intended order.

4.1 Meal Service Protocols

Intent: All staff must 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 fundamental 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 must 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>) must be displayed in the kitchen or in a readily accessible area for wait staff to refer to as an accurate reference guide.
MR 4.1.3	Staff must repeat order back to customer to confirm the order meets customer requirements
MR 4.1.4	GF requests must be clearly documented on order docket
MR 4.1.5	Clear communication protocols from front to back of house must be in place for GF orders. A docket/ticket must be generated for each GF order and accompany the order throughout preparation through to delivery. When leaving the kitchen, GF meal must be identified by an obvious visual cue to indicate GF status
MR 4.1.6	Procedures must be in place to ensure gluten containing garnishes are not placed on GF meals
MR 4.1.7	Wait staff must confirm GF meal when delivering to the customer
BEST PRACTICE	
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	Wait staff to ask if any diners have any dietary requirements when taking orders
BP 4.1.3	A manager or head wait staff oversee customers with dietary requirements
BP 4.1.4	Regular analytical product testing of GF menu items should be conducted to verify GF status. All results should show 'nil detectable gluten'

BP 4.1.5	Ensuring all GF meals are delivered separately to customer i.e. GF food delivered on its own, packaged in separate bag/box/tray.
BP 4.1.6	A range (10-20%, minimum of 4 items) of GF items from the menu should be submitted for gluten testing at a NATA accredited laboratory, demonstrating a 'nil detected' level for gluten.

Appendix 1

Example Menu Allergen Matrix

Organisation name:										
ABC Restaurant										
Food safety supervisor:										
A. Person										
Issue date:										
Gluten Free Pasta with chicken and pesto sauce										
Menu Item	Gluten	Milk/ Dairy	Egg	Peanut	Tree nut	Fish	Shell fish	Soy	Sesame	Lupin
Gluten Free Pasta – XYZ										
Pesto sauce – basil, pine nuts, parmesan cheese, olive oil, cream		✓			✓ Pine nuts					
Chicken Fillets										
Parmesan Cheese		✓								
Green Salad with Italian dressing – mixed lettuce leaves, olive oil, mustard and white vinegar										
Garnish – basil										
Status	Gluten Free <i>Contains dairy and tree nuts</i>									
Variation	Omit Parmesan cheese and pesto for a GF dairy free version									