

Can I use the term 'gluten free'; or more to the point should I be using the term 'gluten free' at all?

You want to cater for or sell prepacked foods to coeliacs and/or those individuals who are sensitive to gluten, but you're not sure what you have to do to comply with the law; what you're able to say in the eyes of the law; and how you can do it without making people ill. Does this sound like you? Here are seven case studies to help you understand what you can and cannot say.

What type of business do I own or run?	Do you require best practice procedures?	Can I use the term 'gluten free'?
1 You run a restaurant, pub, hotel, café, canteen, etc.	YES	NO
2 You're a manufacturer or a food service supplier	YES	YES*
3 You run a dedicated gluten free restaurant, café, etc.	YES	NO
4 You sell ice cream from a van	YES	NO
5 You sell food in a deli, bakers, butchers, etc.	YES	NO
6 You run a takeaway shop, e.g. Kebabs, Fish & Chips, etc.	YES	NO
7 You cater for events, e.g. weddings, conferences, etc.	YES	NO

* YES, but only if you regularly test and can provide evidence, i.e. Certificates of Analysis which prove the statement

You run a restaurant, pub, hotel, cafe, etc.	What's on your menu?	What statements or phrases can you use?	Do you require best practice procedures?
	<p>You have a mixed food offering, i.e. you offer dishes that are both gluten free and non-gluten free. All your dishes are plated and served, i.e. they are not presented to the diner in a sealed pack, where the diner then has to break open the seal prior to eating their meal.</p>	<p>'No gluten containing ingredients'. This phrase is permissible as long as it appears on a completely separate menu, i.e. separate to the menu which lists all your other dishes, namely those that do contain gluten; or it appears in a completely separate section within your main/normal menu.</p>	<p>YES. Several companies offer food allergen training. Accreditation is optional, but it can act as a beacon to passing trade. Staff who interact with either food and/or diners must be trained in how to effectively manage food allergens in the workplace to ensure the risk of cross contamination is kept to an absolute minimum.</p>

You're a manufacturer or food service supplier



What's on your labels?

You produce a range of prepacked foods that you plan to market to coeliac customers? Your manufacturing facilities coupled with your production/processing allergen policies will determine whether or not you can legally claim 'gluten free' or 'very low gluten' status.

What statements or phrases can you use?

Prepacked items - are either '**gluten free**' or '**very low gluten**'. Every batch must be tested and **certified**. The parts per million gluten present must be documented in your HACCP procedures. For naturally gluten free foods you can use either '**suitable for coeliacs**' or '**suitable for people intolerant to gluten**'.

Do you require best practice procedures?

YES. You need to train all staff in how to carry out your production/processing allergen policies to ensure cross contamination does not creep into your process management systems. Accreditation is optional, and can provide a platform for marketing opportunities.

You run a dedicated gluten free eatery



What's on your menu?

You only serve foods that have been prepared, cooked and plated using inherently gluten free, or naturally gluten free raw ingredients and/or prepacked ingredients that are labelled 'gluten free'. Furthermore, you do not store non-gluten free raw ingredients anywhere on the premises.

What statements or phrases can you use?

1. '**No gluten containing ingredients**' since all the dishes will appear on a single menu.
2. If you want to use the statements '**gluten free**' or '**very low gluten**', you have to **TEST** and **PROVE** the parts per million gluten for each and every dish you serve - that's incredibly costly and totally impractical.

Do you require best practice procedures?

YES. Staff may well have a greater understanding of all things gluten free, but training is no less important to ensure the risk of cross contamination is kept to an absolute minimum. Accreditation is optional, but once again it can serve to reinforce what's on offer, especially in respect of passing trade.

You sell ice cream from a van



What's on your Bill of Fare?

An Ice Cream seller will have a combination of prepacked foods and ice cream. If the ice cream is dispensed from a whippy ice cream machine and the server is careful not to touch the dispensing nozzle with a cone, then it might be safe to have the ice cream; but if you use a scoop cross Contamination **will** occur.

What statements or phrases can you use?

1. '**No gluten containing ingredients**' on a completely separate Bill of Fare.
2. The terms '**gluten free**' or '**very low gluten**', only apply to prepacked and labelled foods. They cannot be used for ice cream dispensed via a machine or scoop due to the high risk of cross contamination.

Do you require best practice procedures?

YES. You need to train all staff who interact with food and/or the public in how to effectively manage food allergens in the van to ensure the risk of cross contamination is kept to an absolute minimum. Accreditation is optional, but it can attract additional business.

You sell food in a deli, bakers, butchers, etc.



What's on your sales tickets, labels or Deli Pin Tags?

You sell a combination of prepacked and loose foods over the counter. You use a variety of different utensils and cutting machines - spoons, knives, chopping boards, etc. You cannot 100% guarantee you or a member of your staff will not accidentally use the same utensil for foods that contain gluten?

What statements or phrases can you use?

1. **'No gluten containing ingredients'** as long as the items are on a completely separate Bill of Fayre/blackboard, etc.
2. You can use the statements **'gluten free'** or **'very low gluten'** for items that are supplied to you prepacked and labelled accordingly and they remain prepacked after you sell the item.

Do you require best practice procedures?

YES. You need to train all staff who handle, prep and serve food and/or deal directly with the public. They need to be able to effectively manage food allergens to ensure the risk of cross contamination is kept to an absolute minimum. Accreditation is optional, but it does provide the consumer with a degree of confidence.

You run a takeaway, e.g. Fish & Chip shop



What's on your Bill of Fayre?

You have a **mixed food offering**, i.e. you sell takeaway food that is both gluten free and non-gluten free. If you're **frying** mixed foods in the same vat of oil and/or you use the same 'filter' to clean oil from separate vats - **gluten free is a non-starter**. You will need to find an alternative means of cooking your food.

What statements or phrases can you use?

1. **'No gluten containing ingredients'** as long as it is on a completely separate Bill of Fayre.
2. You can use the statements **'gluten free'** or **'very low gluten'** for items that are supplied to you prepacked and labelled accordingly and they remain prepacked after you sell the item.

Do you require best practice procedures?

YES. You need to train all staff who handle, prep, cook and serve food in how to effectively manage food allergens to ensure the risk of cross contamination is kept to an absolute minimum. Accreditation is optional, but the training offered by expert practitioners can prove invaluable.

You cater for events, e.g. weddings, etc.



What's on your menu/on offer at the buffet?

How are you providing for diners with food allergens? Are you serving plated food to seated guests at tables? Are you providing food via a manned-carvery? Are you providing a self-service buffet? Or you might be using a combination of the above. The buffet is impossible to police.

What statements or phrases can you use?

1. **'No gluten containing ingredients'** as long as the menu is completely separate.
2. You can use the statements **'gluten free'** or **'very low gluten'** for items that are prepacked and labelled accordingly and they remain prepacked after you serve it to your guests.

Do you require best practice procedures?

YES. You need to train all staff who interact with either food and/or guests in how to effectively manage food allergens in the kitchen/at the venue. Accreditation is optional, but it does provide the opportunity to promote your services to a wider audience.