

Gluten-Free Claims – Clear Language, Strong Controls

Key Message: “Gluten free” is the recognised, legally defined term: food described as gluten free must contain no more than **20 mg/kg (20 ppm) gluten**. For loose/non-prepacked food, routine testing is **not mandatory**, but the Food Business Operator (FBO) must have appropriate controls, monitoring and verification to support the claim.

The claim is not the problem – an unsupported claim is the risk.

Clear terminology, documented SOPs and confident customer communication are essential.

Know the Claim – Avoid Confusing Language

GLUTEN FREE – legally defined: ≤ 20 ppm gluten in the final food.

GLUTEN FRIENDLY / COELIAC COMPLIANT – **NOT** the recognised legal term and may be unclear to customers.

GFO / GFA / NGCI – abbreviations can be interpreted differently. Make sure the customer understands exactly what is being offered.

WHEAT FREE – is not the same as gluten free. Gluten may also come from barley and rye; oats require specific consideration.

VERY LOW GLUTEN – less than 100 ppm and not a general hospitality option; it applies to specified gluten-containing cereal ingredients specially processed to reduce gluten

Before Making a Gluten-Free Claim

- Have approved suppliers and current product specifications.
- Check ingredients, recipes and allergen information.
- Assess where gluten cross-contact could occur.
- Define segregation, preparation and cooking controls.
- Specify clean/dedicated equipment and utensils where required.
- Document cleaning and hygiene procedures.
- Train staff and check competency – not just course completion.
- Decide how controls will be monitored and verified.
- Do not make the claim if cross-contact risk cannot be sufficiently mitigated.

Need help on your documentation ?

Get in touch to see how we can help you
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Best Practice Controls

1. Supplier & Ingredient Control

- Use approved suppliers and up-to-date specifications.
- Check substitutions and recipe changes before service.
- Keep gluten-free ingredients clearly identified and protected.

2. Preparation & Cross-Contact

- Define preparation areas, equipment and utensils.
- Control flour, crumbs, fryers, grills and other cross-contact routes.
- Use effective cleaning and hygiene procedures.

3. People & Communication

- Make responsibilities clear from booking/order through to kitchen and service.
- Train staff to stop and ask when they are unsure.
- Use clear written information supported by a conversation.

4. Customer Conversation

- Explain what the business does to manage the request.
- Be transparent that gluten-containing food may also be handled on site where relevant.
- Avoid vague phrases such as “it should be fine”.
- Give the customer enough information to make an informed decision.

5. Monitor & Verify

- Check that documented procedures happen in practice.
- Use audits, observations, records and appropriate verification.
- Testing may be beneficial as a verification check, but is not mandatory.
- Review procedures after product, menu, process or staffing changes and after incidents/near misses.