



# Producing Gluten-Free Products in a Non-dedicated Kitchen

Updated June 2014

## What is Gluten?

Gluten is the common name for a protein found in wheat, rye, barley and all forms and hybrids of these grains. Gluten adds elasticity, volume and texture to many food products. Gluten causes damage to the intestines of people with celiac disease and dermatitis herpetiformis and must be strictly avoided. People with non-celiac gluten sensitivity (also known as "gluten sensitivity") also need to avoid gluten.

## Cross-Contamination.

People following a gluten-free lifestyle have two primary concerns: 1) avoiding prohibited grains and 2) avoiding cross-contamination of gluten-free foods. Cross-contamination is a significant problem in the food industry, especially in non-dedicated milling and baking facilities. Very small amounts of gluten (20 ppm or more) are potentially dangerous to persons on a gluten-free diet. Flour dust in the air, shared equipment with dust particles, use of common utensils and baking equipment, and inadequate cleaning and scheduling of gluten-free vs. gluten-containing production are major causes of cross-contamination of gluten-free products.

## Baking gluten-free in a non-dedicated facility.

It is possible to safely produce gluten-free products in a non-dedicated facility, but policies and procedures must be in place to prevent cross-contamination. These steps and considerations will be helpful with regard to production of safe gluten-free products in your establishment:

### 1. Ingredient handling

If there is a common facility for gluten-free and gluten-containing ingredients:

- a. Establish separate storage and preparation/staging areas for gluten-free and gluten-containing ingredients.
- b. Have separate equipment that is clearly marked and used for either gluten-free or gluten-containing products. This includes measuring tools, mixing bowls, pans, utensils, etc.
- c. Establish policies requiring all employees to have clean garments and hands when handling gluten-free products. This would include a policy about outside foods and beverages not being allowed in the production area, and changing into clean lab coats, aprons, and gloves for gluten-free production.

### 2. Facility and equipment

Best practices for the facility and equipment would be to have separate production areas and equipment with controlled air-flow between the two production areas. Equipment should be dedicated in each area for use on gluten-free or non-gluten-free production. This practice minimizes the potential for air-borne dust contamination.

When this is not possible, you must consider the high risk of cross contamination from airborne dust and shared equipment with residual dust and flour that cannot be easily removed with normal cleaning.

## Things to consider:

1. Ingredient handling
2. Facility and equipment
3. Reducing cross-contamination
4. Scheduling gluten-free production no less than 24 hours after the last gluten-containing production.
5. Separate storage of all gluten-free ingredients and products in sealed, well-marked containers.

### **3. Reduce cross-contamination**

Use wet cleaning systems. Use of wet-wash cleaning systems is the best way to remove gluten from equipment and utensils used in gluten-free production. As much as possible, shared equipment should be broken down before gluten-free production and cleaned using commercial cleaning products and commercial dishwashing systems. When shared equipment cannot be cleaned using a wet-wash system, there is risk of cross-contamination.

### **4. Schedule gluten-free production no less than 24 hours after the last gluten-containing production has been completed (including packaging).**

Give air-borne flour dust adequate time to settle to the ground by scheduling gluten-free production at the beginning of the day, after no production has occurred for at least 24 hours. Scheduling gluten-free production on Monday mornings after a thorough wipe-down has been done and no baking has occurred over the weekend is ideal. Be sure to observe any dust on the equipment and wipe it down and clean utensils that have been exposed to the air before starting production. To be sure, consider doing swab testing of the equipment before production of gluten-free products.

### **5. Storage of all gluten-free ingredients and products in sealed, well-marked containers.**

To avoid cross-contamination all gluten-free ingredients should have a designated storage area and containers, designated prep area and packaging area. These areas should be washed down before use for gluten-free production. All gluten-free products must be stored in closed containers and packages to prevent cross-contamination.

#### **Labeling - The Law**

All goods not consumed on the premises are required to meet the labeling requirements established by the FDA, including ingredient listings, allergy and nutritional information and company information.

#### **Allergy Labeling**

As of January 2006, the top eight common allergens (which include wheat) must be labeled on FDA-regulated products. These allergens are: wheat, eggs, soy, dairy, tree nuts, peanuts, shell fish and finned fish. Labels must list the allergen using common language either immediately after the ingredient [Example: Milk, semolina (wheat), eggs, salt....] or at the end of the ingredient list starting with the word 'Contains'. [Example: Contains wheat, eggs, milk.] This is the allergen labeling format required by the FDA.

#### **Gluten-free Labeling**

In August 2013 the FDA issued a ruling on gluten-free labeling (effective August, 2014). Gluten-free labeling is voluntary. FDA-regulated products carrying a "gluten-free" label claim must meet the definition set by the FDA, which includes:

1. Must contain less than 20 parts per million (ppm) gluten.
2. Cannot contain any type of wheat, rye, barley or crossbreeds of these grains.
3. Cannot contain any ingredient derived from these grains that has not been processed to remove gluten.
4. Cannot contain an ingredient derived from these grains which has been processed to remove gluten, if it results in the food containing 20 or more ppm gluten.

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Other helpful information is available at [www.GLUTEN.org](http://www.GLUTEN.org).

Advances in celiac disease are fast-paced. If this document is more than 2 years old, please visit our website for updated documents.

This information should not be used to diagnose or treat gluten-related disorders or other medical conditions. For questions about these conditions consult your healthcare team when considering this information.

Please consider your local GIG Branch as another resource.

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The Mission of the Gluten Intolerance Group is to empower the gluten-free community through consumer support, advocacy and education.

To make a donation or become a volunteer to GIG, visit our website or call the office at 253-833-6655.