



PURCHASING AGENTS GUIDE

Gluten is a protein found in wheat, barley and rye. Because of cross-contact in the field or in processing, oats are often contaminated with gluten.

Charlie's Table Oasis Gluten-Free Purchasing Guidelines help assure your restaurant's gluten-free offerings are indeed gluten-free.

As a reminder, for the millions of people who have celiac disease, eating gluten-free is *not* a choice. It is a medical treatment. In addition to stomach problems, eating or drinking even the tiniest amount of gluten (a "glutening") can lead to serious problems including cancer and even death.

PURCHASING GLUTEN-FREE GUIDELINES

Keep a list of approved vendors and raw materials and continually update it.

Before Ordering: Supplies On Hand

Check to be sure that gluten-free ingredients and supplies on hand at the restaurant and in off-premises storage areas are clearly marked as gluten-free and not contaminated by cross-contact.

- ❖ If there is a question, testing kits are available. Keep in mind that the kits only test a specific area of the supply. Gluten may be lurking in another area. (To learn more about test kits, [click here.](#))
- ❖ If not already done, mark all supplies that are gluten-free.

Check all supplies that have been ordered, but not yet received to be sure they are gluten-free.

Store gluten-free supplies in an area that is both separate from other supplies and secure from contamination by cross-contact. If not possible, designate higher shelves as gluten-free shelves (for instance by painting them a separate color.)

Protect gluten-free supplies with tight fitting lids or binding closures such as a string.

When purchasing all foods and ingredients:

- ❖ Constantly remind vendors about your gluten-free needs. Keep in mind that:
 - Gluten can hide in many foods.
 - Wheat-free is not the same as gluten-free.
 - It is not possible to remove all gluten from food or ingredients.
- ❖ ALWAYS read labels carefully to check to determine whether any food, ingredient, spice, or anything else used in cooking food is gluten-free.
 - Do not rely on a description in a purchaser's guide. Look at the actual label for a list of ingredients.



- Products that claim to be gluten-free must meet the Food and Drug Administration standard of less than 20 PPM (parts per million) of gluten. Products that are certified gluten-free generally must meet additional requirements.
- It is common for Ingredients to change from time to time – even after years with no change.
- Anything with malt contains barley unless labelled rice malt.
- For additional information about labels see the end of this document.
- Keep in mind:
 - ALL supplies which can possibly come in contact with food must be checked for the possibility of containing gluten, including supplies which are traditionally gluten-free. For example, canned fruits and vegetable may be overlooked because they are naturally gluten-free. However, flavors or seasonings which contain gluten may have been added.
 - ❖ If a product could contain gluten:
 - Look on the package or wholesale (not retail) sales materials.
 - If the label says “gluten-free,” for assurance, look for certification such as the following logos from the [top certification groups](#).
 - If oats are included, look for oats that have been grown in a dedicated field and processed with the process known as purity protocol.
 - ❖ If there is a question whether a product could include gluten:
 - Check lists of products in general which have been known to contain gluten. For one list, see [Charlie’s Table Oasis: A Gluten-Free Lifestyle](#).
 - Check for substitutes, for example at [Charlie’s Table Oasis: A Gluten-Free Lifestyle](#)
 - For information about specific manufacturers and products, see www.GlutenFreeWatchdog.org.
 - For a list of potential misbranded products previously reported to the FDA and USDA in 2020, 2021 and 2022: <https://www.glutenfreewatchdog.org/news/running-list-of-misbranded-gluten-free-products-reported-to-fda-by-gfwd-in-2020/>
 - ❖ Ask the distributor when in doubt, such as when a label says:
 - Made in a facility that processes wheat
 - Made on shared equipment with wheat
 - We follow good manufacturing processes to segregate ingredients to avoid cross contact with allergens
 - ❖ If still in doubt:
 - Look at the manufacturer’s web site or contact the manufacturer
 - Do not assume that information on a retail web site is the same as for food service. Check the food service website if available
 - Contact the manufacturer
 - ❖ Oats
 - As previously noted, oats can be contaminated in processing. There are two methods for being sure there is no gluten in oats: Certification and Purity Protocol. Certification involves



optical sorting. There may still be gluten hidden in a section not seen. On the other hand, under Purity Protocol, oats are harvested, transported, stored, processed and manufactured under good manufacturing practices. Only use Purity Protocol oats. It is not unusual to have to contact the manufacturer to determine the type of oats you are considering.

If you purchase pre-made gluten-free supplies locally such as baked goods or breads:

- Confirm that they are:
 - Gluten-free and
 - Stored and delivered in such a manner that there is no reasonable possibility of contamination by cross-contact between food with gluten and food without gluten.
- To assure compliance in sourcing, if you are purchasing baked goods, show the local source the attached List of Procedures needed to assure gluten-free food safety. Confirm that the source employs the procedures appropriate to their operation.

When reaching out to suppliers, ask your distributors about their gluten prevention controls. For instance:

- Does the distributor require gluten-free certification from a reputable certifying group?
- If not, does the distributor check to find out if a supplier packages gluten-free items alongside products that contain wheat, barley or rye?
- Does the distributor ask what procedures a supplier has in place to prevent contamination from cross-contact?
- If the answer to either of the last two questions is “no,” ask that the distributor adopt these procedures. If the distributor won’t, consider adopting these procedures yourself or change distributors. The safety of your customers depends on it.
- Decide on what written documentation you will accept from each vendor concerning the above questions. Getting things in writing helps assure accuracy of information and provides proof if ultimately needed.

If you are part of a chain of restaurants:

- The Charlie’s Table Oasis Gluten-Free Safety Program is by restaurant location, not ownership.
- With respect to all supplies from headquarters, obtain in writing from the central purchasing agent a written statement that the guidelines described in this Program are adhered to.
- If you purchase any supplies, be sure to follow the Charlie’s Table Oasis gluten-free procedures described in this guide.

When ordering is complete: Keep accessible records of all purchases including:

- Steps taken to be sure each is gluten-free.



- Method used to determine that each ingredient is gluten-free. For example, vendor statements, certification by a reputable certification agency, proof of testing specific lots.

LABELS AND HOW TO READ THEM

How To Read A Label: In General

- **Servings:** The manufacturer's suggested serving size in standard measurements.
- **Calories:** The amount of calories in one serving. The label also shows the amount of calories from fat.
- **Nutrients:** At a minimum, the label must list the amounts in one serving of total fat, saturated fat, trans fat, cholesterol, sodium, vitamins A and C, calcium, total carbohydrates, and iron.
- **Percent daily value:** The percentage of certain nutrients compared to the amount to aim for based on a 2,000 – 2,500 calorie-a-day diet.
- **Ingredients:** All the ingredients in a product, in descending order from most to least. This is where you learn about gluten. Allergy statements are also included here.

How To Look For Gluten On A Label

Step 1. Look for a gluten-free logo or claim

- To determine if a food has gluten, start by looking on the front or back of the package for the words “gluten-free” (with or without a dash) or words that indicate gluten-free such as: “no gluten,” “free of gluten,” or “without gluten.” What the words mean is regulated by the Food and Drug and Administration (FDA) under the authority of the [Food Allergen Labeling And Consumer Protection Act \(FALCPA\)](#)
- As a general matter, leaders in the celiac community also look for an indication that the food is certified to be gluten-free by one of the following organizations:
 - Beyond Celiac examines the entire practices and production process of the manufacturing facility – from ingredient sourcing to employee training, cleaning practices, cross-contact controls, operational management and, finally, an effective end-to-end testing plan. Approval is only for those facilities that continually meet strict, good manufacturing practices for gluten-free production. Certification audits are conducted annually by trained and approved, independent International Standard for Organization (ISO) and third-party accredited auditing companies.
 - BRC Global Standards (BRCGS).



- Gluten Intolerance Group's Gluten-Free Certification Organization (<http://www.gfco.org>). The GFCO requires yearly certification, a process that includes a review of ingredients, product testing, and a plant inspection. It also requires product reviews, onsite inspections, testing and ongoing compliance activities, including random testing.
- National Celiac Association
- NSF International -- gluten-free certification process inspects facilities and products to ensure they contain less than 15 PPM (parts per million of gluten).

Step 2. Check the list of ingredients for the presence of wheat, barley (malt), rye and oats.

If a product is not certified gluten-free, be particularly cautious with products that include a grain, flour or starch and with processed foods.

If there is no gluten-free wording on the label, look at both the ingredients list and the “Contains” statement which lists ingredients. Because wheat is an allergenic, the word “Wheat” must be disclosed. Also look for words that indicate the presence of wheat such as couscous, durum, einkorn, emmer, farrow, Kamut, seitan and spelt. Also look for:

- Barley: including barley malt, barley extract or flavoring
- Brewer’s yeast, Yeast extract/Autolyzed yeast extract
- Oats
- Rye
- Triticale

Keep in mind that “without wheat” does not mean gluten free.

For a list of foods and ingredients with gluten, see [Charlie’s Table Oasis: A Gluten-Free Lifestyle](#).

Step 3. Check for cross contamination. Keep in mind that under the FDA labeling laws and regulations:

- Food manufacturers are not required to test at any particular time or even to test at all.
- What is disclosed beyond the presence of allergens cannot be misleading, but it is voluntary.
- Some companies have been known to label a product gluten-free, but not to test it. It is a reason why a number of people will only eat manufactured foods that are certified to be gluten-free.



- Ideally, your foods are made in a dedicated gluten-free facility. (Otherwise, there may be cross contamination in a particular batch that would escape notice – but not by your body.) A phrase such as “dedicated 100% gluten free facility” indicates that the product was made in a completely gluten-free facility.
- It is up to the manufacturer whether to state the environment in which a gluten-free food is made, or the machine on which it is made. If there is gluten in another part of the processing plant and the company is extra careful, or if a machine is used for both gluten and gluten-free foods but is completely sterilized in between uses, the food product may be gluten-free.

Step 4. If there is a question, contact the manufacturer.

If there is a question about whether a product is truly gluten-free, contact the manufacturer. You can find contact information on a manufacturer’s web site. In addition to asking that question, also ask whether the product is made in a 100% gluten-free facility.

Step 5. If you cannot get through to the manufacturer, check the community

When checking online, be sure the sources you visit have a reputation for reliability – and check the date of the posting. A post may be outdated. For instance, a reliable source is: glutenfreewatchdog.org.

Keep in mind:

- It is generally safe to purchase foods that have little likelihood of having had contact with gluten-containing grains. For instance, bottled water, canned olives, plain diced tomatoes, olive oil.
- There may be wheat in a product, but if it is under 20 PPM (parts per million) the product can still be labeled “gluten-free.” In that case, the label must also say: “The wheat has been processed to allow this food to meet the Food and Drug Administration requirements for gluten-free foods.”

NOTE: During the 2020 Covid-19 pandemic, the FDA loosened some regulations. It is worth noting that the FDA’s temporary policy does not provide labeling flexibilities if a health or safety issue could result – including the substitution of an ingredient containing gluten for a gluten-free ingredient.

LIST OF PROCEDURES -BAKED FOODS

Cooking Oven:



- ◇ Ideally, baked gluten-free foods should be cooked in a separate oven.
- ◇ If there is no separate oven, cook all baked foods on one-time use tinfoil, parchment paper, or dedicated gluten-free sheets.
- ◇ Even dedicated gluten-free sheets must be thoroughly cleaned between each use.

Scheduling:

- ◇ Cleaning time can be reduced if you only bake gluten-free once or twice a week. Foods can be frozen until needed.
- ◇ If there is not enough baking to have a dedicated baking day, schedule baking time first thing in the morning to avoid airborne wheat flour.

Cleaning:

- ◇ Always provide a thorough cleaning after baking and before starting production of gluten-free foods.

Keep in Mind:

- ◇ Flour can stay in the air for 12-24 hours or more depending on the amount of flour in the air and ventilation.
- ◇ Using an electric mixer can disburse flour and create a light film on a prep table, equipment and plates.