

November 2015

Labelling of Gluten-Free Foods

PURPOSE: This paper describes how consumers should read food labels to determine the gluten-free status of foods.

STATEMENT: When shopping for packaged foods, always read ingredient lists carefully to determine whether or not an item is gluten-free.

If any of the following are on an ingredient list, the item is not gluten-free:

- Wheat
- Rye
- Barley
- Oats unless the oats are certified gluten-free¹
- Malt²
- Brewer's yeast

Identifying rye, barley, oats, malt and brewer's yeast is straightforward, since these are virtually always listed by their recognizable names. But looking for wheat can be a little trickier. This is because derivatives of wheat may also contain gluten.

LOOKING FOR WHEAT

Label reading for wheat has become much easier since the "Food Allergen Labeling and Consumer Protection Act" (FALCPA) was passed in 2004. This regulation requires that the top 8 allergens be clearly identified, wheat being one of them. This means that derivatives of wheat must clearly indicate that "wheat" is the source. "Wheat" can either appear in parentheses in the ingredient list or in a separate "contains" statement.

GFCO LABELED PRODUCTS

GFCO maintains a strict standard for all of the products we certify of 10 ppm gluten or less. Every product is manufactured in a facility that undergoes regular audits by GFCO's trained auditors to make sure that the product's ingredients and the company's processes will result in a gluten-free finished product. You can be assured that any product certified by GFCO is safe for those with celiac disease or any other gluten related disorder.

FDA AND USDA

FALCPA applies to the majority of packaged food products, those regulated by the FDA. However, products regulated by the USDA are not required to comply with FALCPA. The USDA regulates meat, poultry and egg products, and mixed food products that generally contain more than three percent raw meat or two percent or more cooked meat or poultry (e.g. soups, chilis, frozen entrees). Even though USDA products are not required to comply with FALCPA, it's estimated that 80 to 90 % of these products voluntarily comply. If you see a "contains" statement or other indication that a USDA-regulated product is complying with FALCPA, then you can simply look for the word "wheat."

ALLERGEN vs VOLUNTARY STATEMENTS ON LABELS

Allergen statements on labels are required for the “top 8” allergens. These must begin with the word “Contains.” This means the product directly contains said allergen. It will be found in the ingredient list as well.

Voluntary statements are those that begin “May contain” or “Manufactured in a facility that also processes” and are NOT required by the FDA.

As a voluntary statement, its intent is to protect IgE allergic persons, however it is widely known that many companies will use these in a couple ways:

- 1) to let consumers know there are allergens in the plant (“may contain is used to indicate that the ingredient is not a part of the product, but is in the plant and for those with IgE allergies they may want to avoid this product due to airborne dust) or
- 2) to cover themselves against lawsuits.

There are no standards for these statements; they are voluntary so no manufacturer has to use them.

GFCO certification pertains to gluten, which is only one component of wheat. People with wheat allergies typically react to other wheat proteins, or even wheat starches, and these reactions can occur at extremely low levels, sometimes much lower than the 10 ppm GFCO threshold for gluten. There are some GFCO certified products that are made in facilities that also manufacture products that contain wheat, but these facilities have very strict controls, cleaning protocols and testing requirements to ensure that there is no gluten in their gluten-free finished products. While there are sensitive and specific tests for wheat gluten, there are no tests for these other allergenic wheat components, so manufacturers use these statements out of an abundance of caution.

Experts in celiac disease and the gluten-free diet do not recommend that gluten-free consumers use these statements to determine safety of the products. The position of the Academy of Nutrition and Dietetics is to disregard these voluntary statements.

Check ingredient lists every time you shop since manufacturers may change ingredients in a product at any time.

1 Oats are inherently gluten-free, however since they are typically grown and processed in close proximity to wheat, they can easily become cross-contaminated with gluten. However, some growers/manufacturers are now selling certified gluten-free oats.

2 “Malt” includes ingredients using malt, such as malt vinegar and barley malt extract. However if you see the word “malt” used in a compound word such as “maltodextrin,” this does not indicate the presence of malt and the product is safe to consume.