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## 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-free<sup>1</sup>
- Malt<sup>2</sup>
- 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 “Big 8” allergens in the United States. This may be done by listing the common name of each allergen within the ingredient list, or by the use of a separate list beginning with the word “Contains.” This means the product directly contains said allergen. “Contains” statements should not be used unless the allergen has been intentionally added to the product. In the interest of transparency, some manufacturers like to let consumers know that allergens are handled in the same facility where an allergen- or gluten-free product is made, and they can do this through the use of voluntary statements like “may contain peanuts”. Voluntary statements are not required or regulated by the FDA, other than the general FDA requirement that all labeling be truthful.

## WHAT DO VOLUNTARY STATEMENTS MEAN ON GFCO CERTIFIED PRODUCTS?

When voluntary statements appear on certified gluten-free foods, their intent is either to protect wheat-allergic persons, or to tell consumers that there is a chance that extremely small amounts of gluten, below the GFCO 10 ppm threshold, may be present. If you see a voluntary statement on a product and want to be sure that the product is really certified, contact GFCO at <http://www.gfco.org/contact-us/>.

Here is how to interpret voluntary advisory statements on GFCO-certified products:

- **“May Contain Wheat”**: This statement is typically used by companies that handle wheat in their facility, but keep it segregated from gluten-free production. It is meant to let consumers know that wheat might be present at extremely low levels, well below the GFCO threshold, but at levels that might trigger a wheat allergy. People with wheat allergies may 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.
- **“Processed on Shared Equipment with Wheat”**: 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 gluten remains below 10 ppm in their gluten-free finished products. While there are sensitive and specific tests for wheat gluten, there are no tests for other allergenic wheat components, so manufacturers use these statements out of an abundance of caution.
- **“Contains Wheat”**: A statement like this should only be used if wheat has been intentionally added to a product, and on a GFCO-certified product this would indicate that the product contains wheat starch, wheat grass, or some other gluten-free component of wheat. Again, the warning in these cases is intended for people with wheat allergies. There have been some instances of manufacturers using a “Contains” statement in place of a “May Contain” or “Shared Equipment” voluntary statement. If you see any labeling that makes you question the certification status of a product, contact GFCO at <http://www.gfco.org/contact-us/>.

If a product is GFCO certified you can feel safe in knowing that the product contains less than 10 ppm gluten. When in doubt, check the certification status of a product.

<sup>1</sup> 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.

<sup>2</sup> “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.