

# Food Labelling: Guidelines for Individuals with Celiac Disease Following a Gluten-Free Diet



**In Canada**, all priority allergens, gluten sources and/or added sulphites, whenever used as an ingredient or a component of a food product, **MUST** be declared by their common name on the food label of a product. The priority allergens, gluten sources and/or added sulphites can be included in the **list of ingredients** or in a **“Contains” statement**, which immediately follows the list of ingredients.

A **“Contains”** statement is **NOT** the same as a **precautionary statement** (also known as cross contamination or allergen advisory statements). Examples of precautionary statements include “may contain wheat”, “made in a facility that also processes wheat and soy” or “manufactured on equipment that also processes wheat.”

Precautionary statements are voluntary and are meant to inform the consumer about a potential source of an allergen. The Canadian Food Inspection Agency (CFIA) states: “A cross contamination statement is a declaration on the label of a prepackaged product that alerts consumers of the possible presence of an allergen in the food. Cross contamination statements **may** be declared by food manufacturers when despite all reasonable measures there is the unintended presence of food allergens in the food. Cross contamination statements are not a substitute for Good Manufacturing Practices.” When precautionary statements are used, they must, like all labelling statements, be truthful, clear and not ambiguous.

## Risk Level Based on Labelling Claims

- Products with **NO** “gluten-free” claim **AND** a “Contains” statement for wheat, barley or rye

If the product does not have a gluten-free claim but there is a “Contains” statement for wheat, barley or rye it is **NOT** safe for people with celiac disease as the product contains a gluten source.

- Products with **NO** “gluten-free claim”, **NO** gluten-containing ingredients **BUT** a precautionary statement for wheat

Health Canada strongly recommends that individuals with wheat allergies or celiac disease should **AVOID** products with a “May contain wheat” statement due to the possible presence of unintended wheat or other gluten sources. However, it is essential to understand that precautionary statements are not regulated and are done on a voluntary basis. Each manufacturer may or may not have their own criteria regarding whether a precautionary statement is used or not. Research has revealed that some products with and without any precautionary statements have been found to contain a gluten source. Clearly, there needs to be more research and criteria for the use of precautionary labelling statements so that consumers with gluten-related disorders or allergies have confidence in choosing safe foods.

- Products **WITH** a “gluten-free” claim

Foods labelled with a “gluten-free” claim must not contain any intentionally added gluten sources and be less than 20 parts per million (ppm) of gluten from unavoidable cross contamination. Products with this claim are **SAFE** for those with celiac disease to consume.

- Products **WITH** a “gluten-free” claim **AND** a precautionary statement for wheat

The CFIA published a recommendation for such cases:

“The use of a ‘gluten-free’ claim in conjunction with a ‘may contain wheat’ statement, while possibly factual, should be done with caution. It is understood that ‘may contain wheat’ could alert individuals with a wheat allergy to the presence of low levels of wheat in a gluten-free food. However, manufacturers must ensure that the product contains no intentionally added gluten sources and less than 20 parts per million (ppm) of gluten as a result of cross contamination on a consistent basis, and that the other criteria for ‘gluten-free’ claims outlined above are also met. In this instance, manufacturers are encouraged to use the statement “may contain less than 20 ppm of wheat”.

For information on Gluten-free claims, refer to: <https://bit.ly/GFClaim>

For information on Allergen-free claims see: <http://bit.ly/AllergenFreeClaim>

Wheat is identified both as a priority allergen and a gluten source by Health Canada, thus wheat must always be declared on food labels when intentionally added to a prepackaged food product. Wheat also can be unintentionally introduced in a food product during the manufacturing process as a result of cross contamination.

Products labelled “Gluten Free” can contain wheat gluten from unavoidable cross contamination at concentration levels below 20 ppm. They also can contain wheat proteins other than gluten that can be harmful to an individual with a wheat allergy.

While the cut off for this threshold is at 20 ppm, manufacturers should aim for no detectable gluten in their products. If the product is labelled “gluten free” **AND** also has a “may contain wheat” statement it is important to note that the gluten-free claim must be truthful, thus the product must be safe for consumption by individuals with celiac disease. However, such products could trigger allergic reactions in individuals with a wheat allergy and thus are **NOT SAFE** for them to consume.

## Summary

Food manufacturers selling or making a product must declare priority food allergens, gluten sources and/or added sulphites when they are a part of, or a component of, an ingredient. Priority food allergens, gluten sources and/or added sulphites can be listed in either the ingredient list or in a “Contains” statement.

- A “**Contains**” statement is not the same as a **Precautionary statement** (e.g., “may contain”, “made in a facility that also processes wheat”, “made on shared equipment with wheat”).
- Products with a “**Contains**” statement for a gluten source (as an ingredient or component of an ingredient) contain gluten proteins and must be avoided by individuals with celiac disease.
- Products with a “**May contain**” statement for a gluten source are warning about possible cross contamination and allergen content. Products with a “May contain” statement must also be avoided unless there is a “Gluten-Free” claim as there is a risk, they could contain gluten proteins.
- In Canada, the use of a precautionary statement on a product label is voluntary. Although there are no specific regulations for the use of various precautionary statements, they must be truthful and not misleading. They should not be used as a substitute for Good Manufacturing Practices (GMP’s) and should express a real risk of cross contamination.
- When a precautionary statement is used, placement and legibility requirements do apply (these regulatory requirements will become fully effective in December 2021).

Food manufacturers are required to identify allergen/gluten-related risks and implement preventive control measures for prepackaged foods sold in Canada. Unfortunately, there is still great variation on the criteria used to decide whether products of concern should contain a precautionary statement. As such there needs to be more research and advocacy to guide criteria for the use of precautionary statements on food labels so that consumers with gluten-related disorders or allergies have confidence in choosing safe foods.

## Levels of Risk for Various Foods and Food Products

There are numerous categories of foods and beverages that do not have any gluten-containing ingredients declared in the list of ingredients or “Contains” statement. Many of these products are safe to consume; however, there are some items that have a higher risk of being cross-contaminated with gluten-containing ingredients. The following discussion provides further background information about these products.

### Grains, Pulses and Flours

Inherently gluten-free grains (e.g., amaranth, buckwheat, corn, oats, quinoa, sorghum), pulses (dried beans, peas and lentils) and flours made from these grains and pulses may have been in contact with wheat, rye and/or barley during seeding, harvest, storage, transportation, processing and/or packaging.

## Oats

Regular oats are frequently contaminated with gluten-containing grains, especially barley. For this reason, it is essential to purchase oats and products made with oats that are labelled “**gluten free**”. Some manufacturers produce “gluten-free” oats under the “purity protocol” process while others use mechanical/optical sorters to clean contaminated conventional oats.

It should be noted that in Health Canada’s *Food and Drug Regulations*, the grains wheat, rye, triticale, barley and oats are included in the definition of gluten. The proteins in wheat, rye, triticale and barley are harmful to individuals with celiac disease and must strictly be avoided. Health Canada conducted a scientific review on the safety of uncontaminated oats for individuals with celiac disease. Their review concludes that “uncontaminated oats were safely ingested for several years by most patients with CD and that there is no conclusive evidence that the consumption of uncontaminated oats by patients with CD should be limited to a specific daily amount.” Therefore, Health Canada does permit specially processed oats to be labelled “gluten free” provided they meet the gluten-free regulation and are under 20 parts per million (ppm) gluten threshold. The full research document can be found at this link: <http://bit.ly/HCOats>

The Canadian Celiac Association position statement on consumption of “gluten-free” oats by individuals with celiac disease can be found at this link: <https://www.celiac.ca/oats-statement/>

## Other Grains and Pulses

Because other grains and pulses (especially lentils) have been found to have cross contact with wheat, rye and/or barley, it is strongly recommended to purchase these products with a “**gluten-free**” claim. If it is not possible to purchase dried pulses with a gluten-free claim, it is recommended to place the pulses on a clean cookie sheet and visually inspect for foreign grain kernels. Discard any foreign grain kernels, rinse the pulses well with water using a clean colander/sieve and drain prior to preparation and consumption.

**Plain rice and wild rice** are not typically grown on land where wheat, rye and/or barley have previously been planted. Therefore, the risk of contamination in rice and wild rice is much lower compared to other gluten-free grains. It is possible that rice may be transported and packaged in facilities where gluten-containing grains are processed. Some brands of rice and wild rice include a “gluten-free” claim, but they are often more expensive and not always commonly available compared to those without a gluten-free claim. Given the low risk of contamination, individuals with celiac disease do not need to purchase rice and/or wild rice with a “gluten-free” claim.

Rice/wild rice mixes and pilafs often contain other ingredients that may include wheat and/or barley groats in addition to rice. Also, rice and wild rice mixes and pilafs may include seasoning blends or sauces that contain gluten. Always check the ingredient list to make sure there are no gluten-containing ingredients added to packaged rice blend products.

## Starches

Various starches such as arrowroot, potato, tapioca and corn are inherently gluten free. However, some starches may be imported from other countries that may not have the same high standards for preventing contamination from allergens and gluten sources. It is recommended to purchase starches labelled “gluten free”.

## Flax and Hemp Seeds

Flax and hemp seeds are inherently gluten free. However, they may have been grown on land where wheat, rye or barley had previously been grown and harvested. Also, flax and hemp seeds may be transported with and/or processed in a facility that handles gluten-containing grains. It is recommended to purchase flax and hemp seeds with a “gluten-free” claim.

## Baked Products, Cereals and Pastas

It is **NOT** recommended to purchase baked products, cereals and pastas made with naturally gluten-free grains and/or flours **without a gluten-free claim** (regardless if it does or does not include a may contain wheat statement) as these ingredients are high risk for cross contamination with wheat, rye and/or barley. Also, it is **NOT** recommended to purchase gluten free baked products from bakeries that also produce gluten-containing items, as the risk of cross contamination is very high due to airborne flour dust, dough sticking to equipment and baking pans.

## General Guidelines for Selecting Products Based on Ingredients, Claims and Statements

FOOD ITEMS OR PRODUCTS	ALLOWED	AVOID	COMMENTS
Grains and Flours <b>NOT</b> labelled "Gluten Free" - Amaranth, buckwheat, corn, millet, quinoa, sorghum, teff		<b>X</b>	Fresh, frozen or canned corn is low risk.
Grains <b>NOT</b> labelled "Gluten Free" - Plain rice and wild rice	✓		
Grains labelled "Gluten Free" - Amaranth, buckwheat, corn, millet, quinoa, rice, sorghum, teff, wild rice	✓		
Oats <b>NOT</b> labelled "Gluten Free"		<b>X</b>	
Oats labelled "Gluten Free"	✓		
Pulses (dried beans, peas, lentils) and Pulse flours <b>NOT</b> labelled "Gluten Free"		<b>X</b>	If using pulses that are not labelled "gluten free" - do visual inspection/sort, remove any foreign grains, place in colander, rinse well with cold water
Pulses and Pulse Flours labelled "Gluten Free"	✓		
Starches (arrowroot, corn, potato, tapioca) <b>NOT</b> labelled "Gluten Free"		<b>X</b>	
Starches labelled "Gluten Free"	✓		
Flax Seeds, Hemp Seeds <b>NOT</b> labelled "Gluten Free"		<b>X</b>	
Flax Seeds, Hemp Seeds labelled "Gluten Free"	✓		
<b>NO</b> "Gluten-Free claim <b>AND</b> a "Contains" statement for wheat or other gluten ingredients		<b>X</b>	
<b>NO</b> "Gluten-Free" claim, <b>NO</b> gluten-containing ingredients <b>BUT</b> a "May contain wheat" claim		<b>X</b>	
A "Gluten-Free" claim on a product	✓		
A "Gluten-Free" claim <b>AND</b> a "May contain wheat" claim	✓		
Gluten-Free Products made in a bakery that also produces gluten-containing products		<b>X</b>	

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**Joint FAO/WHO Food Standards Programme**

**Codex Committee on Food Labelling**

**Discussion Paper on Allergen Labelling CX/FL 19/45/8**

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