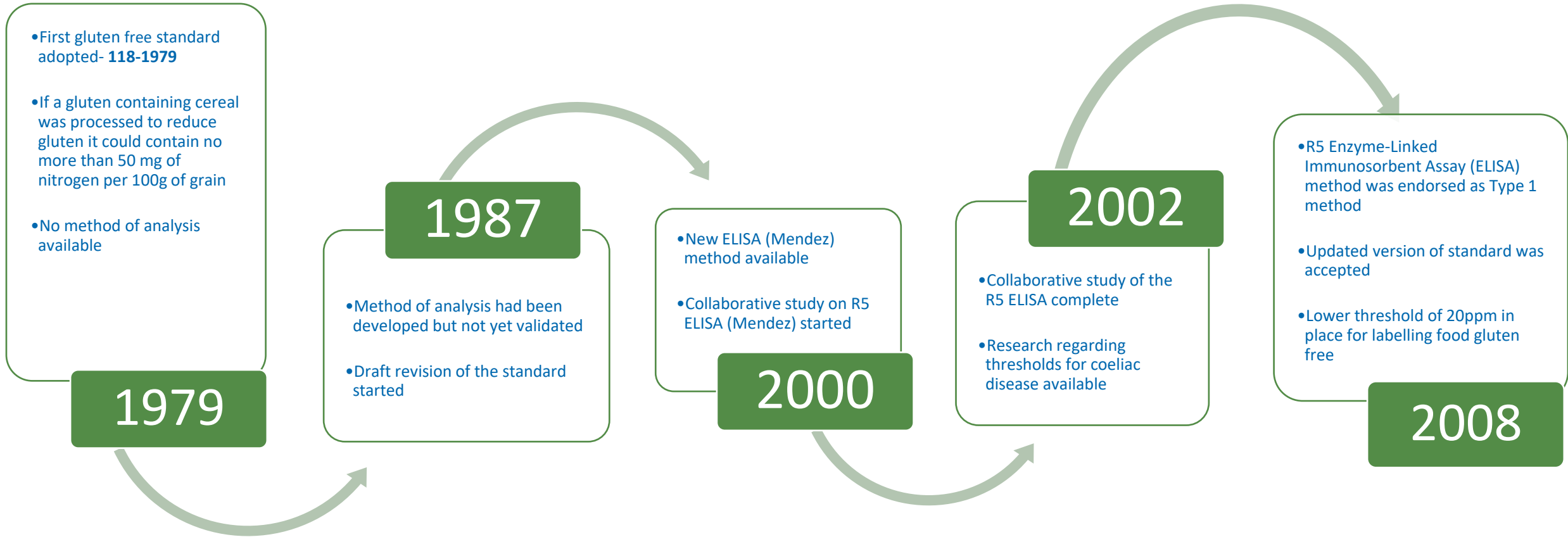


# Gluten free labelling - USA vs EU

Hilary Croft- CEO Coeliac UK, Board Member AOECS

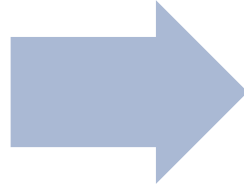
# Codex Standard for Gluten Free Foods



# Gluten Free Labelling in the EU

EU Regulation 41/2009;  
concerning the composition  
and labelling of foodstuffs  
suitable for people intolerant  
to gluten

- First law in EU around the term gluten free
- Gluten free =  $\leq$  20ppm
- Fermentation and hydrolysis are accepted as processes to reduce gluten



EU Regulation 828/2014;  
requirements for the provision  
of information to consumers  
on the absence or reduced  
presence of gluten

- Changes due to EU allergen labelling legislation
- Can only use the term “gluten free” to describe foods

# Allergen labelling EU

Regulation (EU) No. 1169/2011 Food Information for Consumers



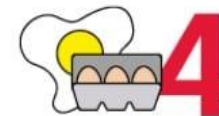
Celery



Cereals containing gluten



Crustaceans



Eggs



Fish



Lupin



Milk



Molluscs



Mustard



Nuts



Peanuts



Sesame Seeds



Soya



Sulphur Dioxide (Sulphites)



Since December 2014 The Food Information Regulation requires that food businesses must provide information about the allergenic ingredients in any food sold or provided.

These 14 major allergens must be mentioned (either on a label or through provided information such as menus).



# Allergen labelling USA

Food Allergen Labelling And Consumer Protection Act of 2004



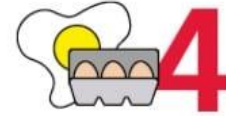
Celery



WHEAT



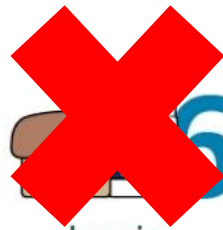
Crustaceans



Eggs



Fish



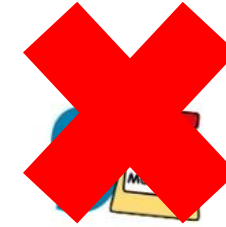
Lupin



Milk



Molluscs



Mustard



Nuts



Peanuts



Sesame Seeds  
Mandatory  
from 2023



Soya



Sulphur Dioxide  
(Sulphites)



Threshold for labelling a product 'gluten free'

Cereals containing gluten that must be emphasised in the ingredients list

Is fermentation and hydrolysis accepted as a 'process to remove gluten'?

Is distillation accepted as a 'process to remove gluten'?

# EU



**Ingredients:**  
Dried and sweetened dried fruit (25%) [sultanas, sweetened dried pineapple (10%) (sugar, pineapple, acid: citric acid, preservative: sulphur dioxide), dates, raisins], barley flakes, oat flakes, wheat flakes, toasted and malted wheat flakes (wheat, barley malt extract).



# USA



**Ingredients:** Corn, Sugar, Whole Grain Rolled Oats, Whole Grain Wheat, Rice, Canola Oil, Corn Syrup, Salt, Molasses, Honey, Caramel Color, Barley Malt Extract. BHT added to preserve freshness.  
**Vitamins and Minerals:** Reduced



For more information about gluten analysis, listen to a talk by an internationally renowned expert in this area, Professor Katharina Scherf:

<https://www.coeliac.org.uk/methods-for-gluten-analysis/>

# Crossed Grain Trademark – Europe's leading gluten free mark



- Crossed Grain Trademark (CGT) is a globally registered trademark for the gluten free food sector
- In Europe and beyond there is a worldwide scheme for licensing the CGT to certify gluten free foods - giving confidence to people around the globe, who need a gluten free diet
- Foods carrying the CGT go beyond just labelling a product 'gluten free':
  - Products must meet the AOECs Standard
  - Involves an independent audit of production facilities
  - Products are analysed to determine gluten content
  - Oversight by coeliac societies

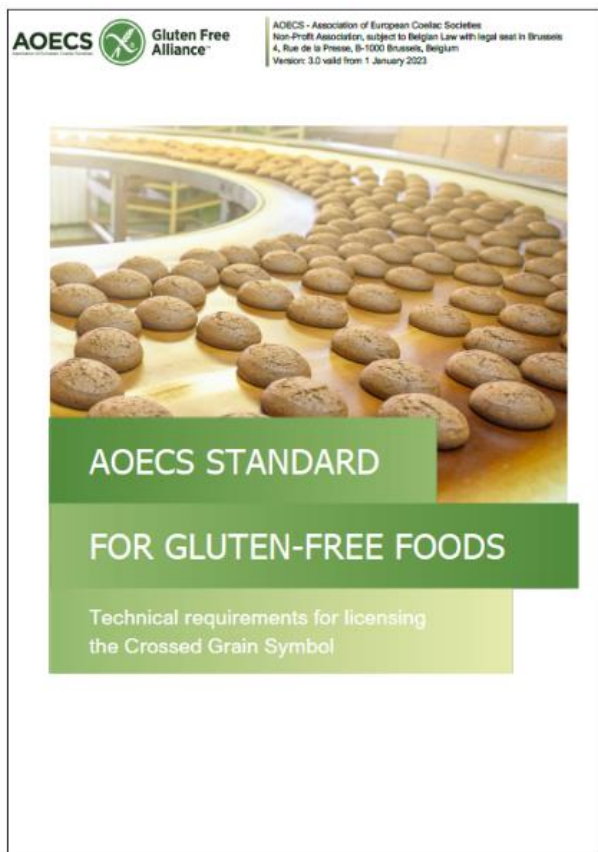
The AOECs Standard meets the requirements of Codex Standard for labelling gluten free

Wherever the CGT is used it MUST meet local legislation requirement:

i.e. in USA, needs to meet:

- Gluten free labelling of foods- Final Rule (78 FR 47154)
- Gluten free labelling on fermented hydrolysed foods- Final rule (89 FR 49240)

# AOECS Standard for Gluten-free foods



The AOECS Standard sets out the technical requirements for licensing the Crossed Grain Trademark (CGT)

Defines:

- 'Gluten free' for the purpose of applying the CGT
- Analytical methods for testing the levels of gluten and need for independent testing by accredited laboratories
- The need for cross contamination controls around gluten
  - Raw material supply
  - Production
  - Storage
  - Transportation
  - Handling
  - Cleaning Operations
- Labelling requirements for applying the CGT



# Importance of the Crossed Grain Trademark

- The Crossed Grain Trademark is internationally recognised by those who need to follow a gluten free diet
- The logo, gluten free consumers look for and trust
  - 78% trust products with the CGT more than just words
  - 95% want to see CGT on all Gluten Free foods
- Clear visual communication that CGT certified gluten free products are authentic and safe
  - avoiding contamination of gluten
  - go above and beyond the regulations
- Provides a source of trust and reassurance when making product choices due to the audit process and alignment with patient organisations

