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

Understanding food labels can be confusing. These guidelines are based on current evidence to provide practical information and tips about reading labels so that you can safely follow a gluten-free diet. It is important to eliminate the gluten-containing grains barley, rye, wheat, triticale, spelt, kamut and einkorn. In addition, regular oats* must be avoided as they are frequently contaminated with barley and/or wheat.

Contains and May Contain Statements

In Canada, all priority allergens (eggs, milk, peanuts, tree nuts, wheat and triticale; soy, fish, crustaceans and molluscs; sesame seeds and mustard), gluten sources (barley, rye, wheat, triticale and regular oats*) and added sulphites, when 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 added sulphites must be included in the **list of ingredients** *OR* in a **"Contains" statement**, which immediately follows the list of ingredients.

*Health Canada considers regular oats as a gluten source; however, specially produced oats can be labelled "gluten free". For more information about oats see page 5.

Canadian Food and Inspection Agency: Food allergen labelling requirements

How to label allergens

Within the **ingredients** list		Using a **contains** statement
Ingredients: Apples, Pie crust [flour (wheat), shortening, liquid albumen (egg), salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon. May contain pecans.	**OR**	**Ingredients:** Apples, Pie crust [flour, shortening, liquid albumen, salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon. **Contains:** Wheat, Egg, Milk. May contain pecans.

A **"Contains"** statement is **NOT** the same as a **precautionary or "May contain" 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" 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 cross contamination (precautionary statements) are used, they must, like all labelling statements, be truthful, clear and not ambiguous.

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Canadian Food Inspection Agency: Contains and May Contains Statements

Ingredients: Apples, Pie crust [flour (wheat), shortening, liquid albumen (egg), salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon.
May contain pecans.

If the packaged foods contain priority food allergens, gluten sources, or added sulphites, they must be declared at least once in the list of ingredients.

Ingredients: Apples, Pie crust [flour (wheat), shortening, liquid albumen (egg), salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon.
May contain pecans.

Priority food allergens, gluten sources, and added sulphites must be declared when they are part of, or a component of, an ingredient.

Ingredients: Apples, Pie crust [flour (wheat), shortening, liquid albumen (egg), salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon.
May contain pecans.

Cross-contamination (or precautionary) statements are used when a food allergen or gluten source may be unintentionally present in the food (e.g. through cross-contamination) despite the use of good manufacturing practices.

Gluten Risk Based on Labelling Claims

- Products with **NO** "gluten-free" claim **AND NO** gluten-containing ingredients

  If a food product does not have a gluten-free claim and there are no gluten-containing ingredients listed on the label, the product is considered safe for individuals with celiac disease.

- 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 important to know 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 precautionary statements have been found to contain gluten. As such, more research is needed to better understand gluten (and other allergen) contamination risk with products that have precautionary statements. Also, there is a need for the development of specific criteria for the appropriate use of precautionary statements so that consumers with gluten-related disorders or allergies have confidence in choosing safe foods.

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- Products **WITH** a "gluten-free" claim

  Foods labelled with a "gluten-free" claim must not contain any intentionally added gluten sources and must be less than 20 parts per million (ppm) of gluten from unavoidable cross contamination. Products with a gluten-free claim are safe for individuals with celiac disease.

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

  The CFIA published a recommendation for these products:

  > "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".

Wheat is identified both as a priority allergen and a gluten source by Health Canada. If wheat is intentionally added to a food product, it must always be declared on the food label. Wheat can also unintentionally be in a food product. This can occur due to cross contamination during the manufacturing process.

While the cut off for unavoidable contamination is 20 ppm, manufacturers of gluten free products 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 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.

For information about Gluten-Free claims, refer to: https://bit.ly/GFClaim

For information on Allergen-Free claims, refer to: http://bit.ly/AllergenFreeClaim

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Summary

Food manufacturers selling or making a product must declare priority food allergens, gluten sources and added sulphites when they are a part of, or a component of, an ingredient. All priority food allergens, gluten sources and added sulphites **MUST** be listed in either the ingredient list or in a "Contains" statement immediately following the list of ingredients.

- 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 any gluten source (as an ingredient or component of an ingredient) must be avoided by individuals with celiac disease.
- Products with a **"May contain"** statement for a source of gluten are warning about possible cross contamination and allergen content. Products with a "May contain" statement must also be avoided by individuals with celiac disease unless there is a "Gluten-Free" claim.
- 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).

In Canada, food manufacturers are required to identify allergen and gluten-related risks, as well as use preventive control measures for pre-packaged foods. Unfortunately, there are no legislative requirements for use of precautionary statements on products sold in Canada at this time. This results in no guidance and variation among manufacturers regarding the decision to use precautionary statements on products of concern. This can confuse consumers about contamination risk and limit safe purchasing options for people with gluten-related disorders or allergies. 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.

Food Item or Product	ALLOWED	AVOID
NO "Gluten-Free" claim, **NO** gluten-containing ingredients	✓	
NO "Gluten-Free" claim **AND** a "Contains" statement for wheat or other gluten ingredients		✗
NO "Gluten-Free" claim, **NO** gluten-containing ingredients **BUT** a "May contain wheat" claim		✗
A "Gluten-Free" claim on a product	✓	
A "Gluten-Free" claim **AND** a "May contain wheat" claim	✓	
Gluten-Free Products made in a bakery that also produces gluten-containing products		✗

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Gluten Risk for Various Foods and Food Products

There are many categories of foods and beverages that do not have any gluten-containing ingredients declared in the list of ingredients or in a "Contains" statement. Many of these products are safe for individuals with gluten-related disorders to consume. However, there are some items that have a higher risk of being cross-contaminated with gluten-containing ingredients. The following provides more information about these products.

Grains, Pulses and Flours made from Grains and Pulses

Naturally gluten-free grains (e.g., amaranth, buckwheat, corn, millet, 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. This means they are at risk of being contaminated with gluten-containing ingredients and would not be safe for individuals with celiac disease.

Oats

Oats are a grain. Regular oats are frequently contaminated with gluten-containing grains, especially wheat and/or barley. For this reason, individuals with celiac disease should only 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 regular oats.

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 celiac disease and that there is no conclusive evidence that the consumption of uncontaminated oats by patients with celiac disease 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**

It should be noted that in Canada these specially processed oats will be labelled "gluten-free oats" in the ingredient list. If it only states "oats" these are not specially processed and are NOT safe for those with celiac disease. 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/**

Remember... ***every product you purchase is a choice. As informed consumers, it is up to each individual to evaluate and determine their own comfort level while assessing the risk of individual products.***

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Pulses

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

Also, it is recommended to purchase pulse-based products (e.g., flours, pastas, soups, stews) with a gluten-free claim as pulses (especially lentils) are high risk for cross contamination and it is not possible to visually inspect for foreign grain kernels in these products.

Rice

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 naturally gluten-free grains. It is possible that rice may be transported and packaged in facilities where gluten-containing grains are processed. Thus, we recommend to visually inspect and rinse rice before cooking. 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.

Pre-packaged rice and/or wild rice mixes and pilafs often contain other ingredients that may include wheat and/or barley groats in addition to the rice. Rice and wild rice mixes and pilafs also 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 pre-packaged rice blend products.

Rice flour may be milled in facilities that also process wheat, barley and/or rye. It is recommended to purchase rice flour that is labelled "gluten free".

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Flax and Hemp Seeds

Flax and hemp seeds are naturally 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 that individuals with celiac disease purchase flax and hemp seeds with a “gluten-free” claim.

Nuts

Unlike oats, lentils, flax and hemp, which are frequently cross contaminated with gluten-containing grains during seeding, harvest, transportation and milling; nuts **DO NOT** pose the same risk level. Nuts are not typically grown in areas or in rotation with gluten-containing grains. Thus, nuts are not considered a high-risk food so individuals with celiac disease do not need to purchase nuts or products containing nuts with a gluten-free claim.

Baked Products, Cereals and Pastas

Baked products, cereals and pastas made with naturally gluten-free grains and/or flours can be high risk for contamination with wheat, rye and/or barley. Therefore, it is recommended that individuals with celiac disease purchase baked products, cereals and pastas made with these gluten-free grains and/or flours sources that have a **gluten-free claim**.

Also, it is **NOT** recommended to purchase “gluten-free” baked products from bakeries that also make gluten-containing items. This is because the risk of gluten cross contamination is very high due to airborne flour dust, as well as gluten cross contamination from dough adhering to equipment and baking pans.

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Guidelines for Selecting Products Based on Ingredients, Claims and Statements

Food Item or Product	Allowed	Avoid	Comments
Grains and Flours **NOT** labelled "Gluten Free" *amaranth, buckwheat, corn, millet, quinoa, sorghum, teff*		✗	Fresh, frozen or canned corn is low risk, so these products with no gluten-free claims are safe for individuals with celiac disease.
Rice: 1. Rice as a grain 2. Rice flour	✓	 ✗	Rice as a grain is low risk and does not need to be labelled gluten free Rice flour may be milled in facilities that also process wheat, barley and/or rye. It is recommended to purchase rice flour that is labelled "gluten free".
Grains and Flours labelled "Gluten Free" *amaranth, buckwheat, corn, millet, quinoa, sorghum, teff*	✓		
Oats **NOT** labelled "Gluten Free"		✗	
Oats labelled "Gluten Free"	✓		
Pulses (beans, peas, lentils)			Pulses (especially lentils) are high risk for gluten cross contamination. It is recommended to buy pulses labelled "gluten free" whenever possible. For pulses that are not labelled "gluten free" 1. Do a visual inspection for any foreign grains 2. Remove any foreign grains 3. Rinse well with cold water before cooking
Pulse-Based Products (e.g., flours, pastas, soups, stews)			It is not possible to visually inspect for foreign grains in pulse-based products. Only consume pulse-based products with a "gluten-free" claim.
Flax Seeds, Hemp Seeds **NOT** labelled "Gluten Free"		✗	
Flax Seeds, Hemp Seeds labelled "Gluten Free"	✓		

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Primary Author

Shelley Case, RD,
Canadian Celiac Association (CCA) Professional Advisory Council (PAC),

in collaboration with CCA Registered Dietitian Working Group:
Caleigh McAulay, Nicole Byrom, Dayna Weiten, Inez Martincevic, Meagan Vurzinger, Jess Pirnak, Emily Kewell, Melissa Secord

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CCA has teamed up with the Gluten-free Certification Program to offer a searchable certified product finder to help you stock your gluten-free pantry with safe gluten-free foods. Thousands of products carry the CCA's trusted GFCP mark. Click here to read more:

https://www.celiac.ca/living-gluten-free/gf-product-finder/

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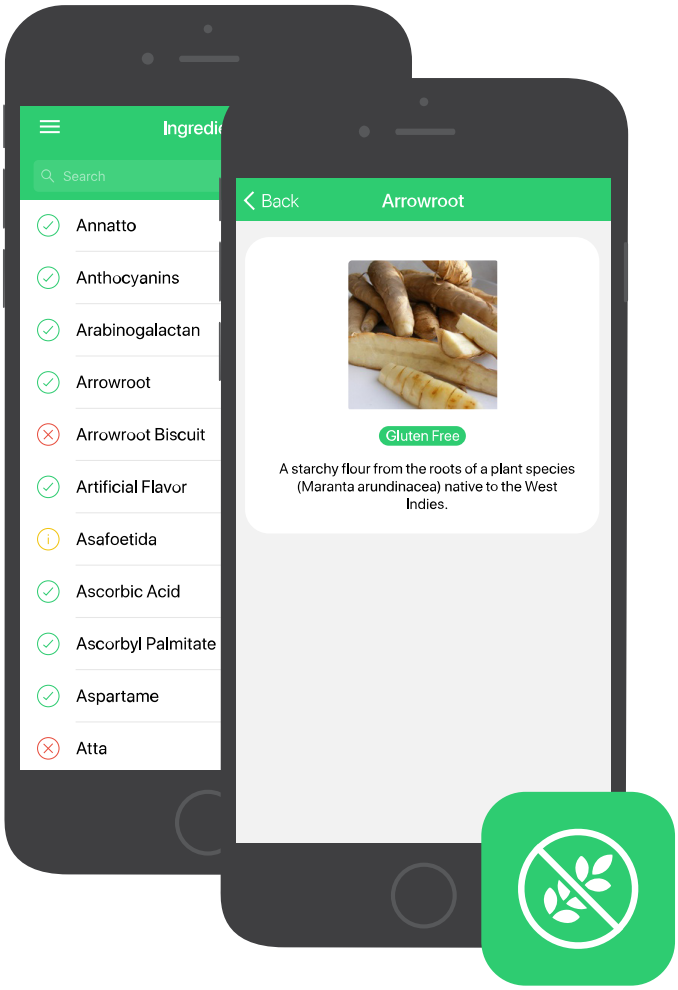

Do you like our pocket dictionary? Well, you will love the Gluten Free 24/7 app!

Gluten Free 24/7 was created in collaboration with the Canadian Celiac Association. This app is simple to use and will make shopping and food selection a snap.

Click here to learn more: https://glutenfree247.ca/