



Living Gluten-Free

by [Tricia Thompson, MS, RD](#), The Gluten-Free Dietitian

### Gluten Free: 4 Food Labeling Questions

I have the pleasure of frequently speaking with gluten-free support groups via teleseminar. I also speak frequently with manufacturers and others involved in gluten-free food production. There are several questions regarding the FDA's proposed gluten-free labeling rule that come up time and time again.

Four of the most common are discussed below. The answers provided are based on the FDA's proposed rule for the labeling of foods as gluten free.

Keep in mind that the final rule may differ.

#### **Can a food be labeled gluten-free as long as it contains less than 20 parts per million of gluten?**

A food must contain less than 20 parts per million of gluten to be labeled gluten free BUT there are other conditions that also must be met. There are certain ingredients that can not be used in a product labeled gluten free regardless of how much gluten the final food product contains. Foods labeled gluten free can not include any ingredients that are prohibited grains. Prohibited grains include wheat, barley, rye, and cross-bred varieties of these grains such as triticale. Foods labeled gluten free also can not contain an ingredient that is derived from a prohibited grain AND has not been processed to remove gluten. Examples of these types of ingredients include hydrolyzed wheat protein, wheat germ, barley malt extract or flavoring, and malt vinegar.

#### **Must all ingredients used in a food labeled gluten free contain less than 20 parts per million of gluten?**

Foods labeled gluten free may contain ingredients derived from a prohibited grain that also have been processed to remove gluten. Examples of these types of ingredients include modified food starch and wheat starch. While the ingredient itself, such as wheat starch may contain 20 parts per million or more of gluten, the overall food product containing the wheat starch must contain less than 20 parts per million of gluten.

**If a food is labeled gluten free but** also contains an advisory allergen statement is it safe to eat?

Obviously it is a personal preference whether you eat a food labeled gluten free that also contains an advisory allergen statement but there are a few things to keep in mind. Foods labeled gluten free must contain less than 20 parts per million of gluten regardless of how that gluten made its way into the food, including through contamination. Also, advisory allergen labeling is voluntary and not regulated at this time. Just because a manufacturer does not state on their product label that the food was manufactured in a plant that also processes wheat containing foods does not mean that it wasn't. Please keep in mind that advisory allergen labeling (e.g., this product was packaged using equipment that also handles wheat) is not the same as the Food Allergen Labeling and Consumer Protection Act.

### **If a food is labeled gluten-free can it contain wheat protein?**

A food can be labeled gluten free even if it includes certain ingredients (e.g., wheat starch) that may contain small amounts of wheat protein. Under the Food Allergen Labeling and Consumer Protection Act, if an ingredient in a food product contains any amount of wheat protein, the word wheat must be included on the label, either in the ingredient list or Contains statement. However, a food may be labeled gluten free as long as it contains less than 20 parts per million of gluten.

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