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**What does "certified" mean? Can you have "certified gluten-free" on a label if the product tests<5ppm? Also, if there are other products produced in the facility with wheat, is this disclaimer required on the product?**

"Certified Gluten-Free" means that the product's gluten-free claim has been verified by an independent organization. Under GFCO guidelines, products made according to GFCO requirements, containing <10 ppm of gluten, and using ingredients that contain <10 ppm of gluten, would be eligible to carry the GFCO logo pending an application, audit, and other review processes. "May Contain" and "Shared Equipment" statements are voluntary – they are not required, and are not regulated by the FDA other than under the general requirement that all statements on packaging be truthful.

**What about glucose that states it could come from wheat or corn on the ingredients label--is this safe for someone with celiac disease?**

Glucose is gluten-free and safe for someone with celiac disease. It is a highly processed product, consisting of pure carbohydrate. Even when the source is wheat, no protein of any sort (including gluten) remains in the final product.

**How safe is a "gluten-removed" food?**

That depends on how the gluten is removed. If a grain product is processed to remove all proteins, for instance to make a starch or an oil, then those can be safe. But be careful of any food or beverage that claims to have used chemicals or enzymes to specifically remove gluten. These processes are not acceptable to GFCO.

**What percent of the end product is tested for the 10ppm? Is every package tested, or every batch, etc.?**

Testing levels are assigned based on the product risk – it isn't a fixed percentage. It cannot be done on every package, or there would be no product to sell, but higher risk products are assigned testing of every lot.

**How can we report a product that is misusing the GFCO logo?**

By going to [www.gfc.org/contact-us](http://www.gfc.org/contact-us), or by calling 253-833-6655

**If you have celiac disease, should you not eat any product that contains vinegar?**

Most vinegars are gluten-free; they are distilled and are made from gluten-free ingredients (e.g. grapes). The only vinegar which needs to be avoided is malt vinegar. Malt vinegar is not distilled, and malt is derived from barley, which is not gluten-free. If you see the term "vinegar" in the ingredients list of a product which is certified or labeled gluten-free, it is safe to consume. On products which are not certified or not labeled gluten-free, the general term "vinegar" could mean



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malt vinegar and the product should be avoided unless it can be confirmed with the manufacturer that the vinegar is not malt vinegar.

### **How can I report if I got sick from a product labeled with GFCO?**

By going to [www.gfc.org/contact-us](http://www.gfc.org/contact-us), or by calling 253-833-6655

### **What do the "gluten removed" statements on beer mean? How do I tell which beers are safe?**

Right now, beers that make a gluten-removed claim are using enzymes to break down the gluten into smaller fragments. Our research and the research of others indicates that this process isn't 100% effective, so we recommend avoiding gluten removed beers. Safe beers are those that don't have wheat, rye, barley or their hybrids in the ingredient list. Watch our beer study webinar here {LINK <https://www.gluten.org/branchnews/gluten-free-vs-gluten-removed-beer-study/>} for more information, or check out our Q&A on the topic {LINK <https://www.gluten.org/gluten-free-vs-gluten-removed-beer-study-q/>}

### **What does purity processed oats mean?**

What you are likely referring to is the Purity Protocol, which is a set of conditions that oat processors put on themselves and their growers in order to ensure they have gluten-free oats. GFCO recently published a definition of the Purity Protocol in Cereal Chemistry, and you can request a copy of this publication from GIG.

### **What about products that are labeled gluten-free, but their oats are not certified? Are these safe?**

If you are talking about a GFCO certified product, then yes. Oats are considered a high risk ingredient in gluten free food production, and oats that are not certified by GFCO must be extensively tested before use in a GFCO certified product. There is no such requirement for foods that have a generic gluten free label, but the manufacturer should be ensuring that the finished product contains <20 ppm gluten.

### **How many consumer complaints does it take before a product is inspected or pulled?**

We investigate every consumer complaint. Product will only be pulled from the market if we establish that it is in violation of its gluten-free claims.

### **What about nutritional yeast?**

Nutritional yeast is gluten-free (as is baking yeast). The only type of yeast to be concerned about is brewer's yeast, which may be derived from beer.



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### **Is yeast extract a concern for a gluten free diet and as well as for wheat allergy?**

Yeast extract is gluten-free and safe to consume on a gluten-free diet. With regard to wheat allergy, any ingredient containing wheat (in FDA regulated products) would need to clearly indicate that this is the case, either in or right after the ingredients list.

### **I had heard that maltodextrin was safe in the U.S. as it is derived from corn, but that is should be avoided in other countries. Is this accurate?**

Because of the highly processed nature of maltodextrin, it is safe to consume even if derived from wheat. Maltodextrin is also confusing to some gluten-free consumers because it contains the word "malt"; however, it does not have anything to do with the ingredient malt (or therefore barley).

### **Is maltodextrin and/or dextrose gluten-free?**

Maltodextrin is gluten-free (see answer above). Dextrose is also gluten-free: it is a highly processed simple sugar and contains no protein, gluten or otherwise.

### **My lentils are organic, do they still need to be labeled gluten-free?**

Due to risk of cross-contamination, lentils should be either certified or labeled gluten-free. Organic status is unrelated to gluten-free status, so this recommendation applies equally to organic lentils.

### **I have heard that refining agents for wine can be a source of gluten contamination. Is this true?**

Gluten is used very rarely as a fining agent for wine, and many studies on other allergenic fining agents (casein, isinglass from fish) indicate that very little residue remains after the fining process. The risk of ingesting gluten from wines is small, but we would still like to see the TTB issue allergen/gluten labeling requirements.

### **I have heard Mexico labels certain beers as gluten-free as in the distillation process, the beer is rendered gluten free. The U.S. won't label them gluten-free as they initially had gluten in it. Is it safe to drink?**

GFCO recommends sticking with the proposed FDA guidelines for fermented products like beer - if they start with gluten containing ingredients, it is best to avoid them.

### **Can you explain the "may contain" statements and why those with celiac disease do not need to worry about them?**

"May contain" type statements are voluntarily included on some products for various reasons, including to alert wheat allergic consumers of the presence of wheat. For purposes of choosing gluten-free products, these types of statements are not relevant. If you see this type of statement on a product that is either certified or labeled gluten-free, the gluten-free labeling/certification means that it is gluten-free regardless of any "may contain" type statements. If you see this type of statement on



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an unlabeled/uncertified product, but the ingredients list indicates that the product is gluten-free, then once again it is not relevant to the gluten-free status of the product.

**What do you suggest that celiacs do when they come across a product without certification or without a gluten free claim, and the ingredient list does not appear to have gluten-containing ingredients, but the nutrition label has a "may contain" or "shared equipment" statement?**

Presence of these "may contain" or "shared equipment" type statements even on un-labeled/un-certified products is not an indication of contamination with gluten. If the ingredients list indicates that the product is gluten-free, the product should be as safe to consume as a product made of the same ingredients which does not carry this type of statement.

**Can you give quick summary of differences from what is presented today for Canada.**

In terms of what we talked about in our webinar, Canada requires that all gluten sources be named, just like allergen sources. So you would see barley and rye listed next to the ingredient name or in a "Contains" statement just like wheat, if those words didn't already occur in the common or usual name of the ingredient.

**Is there any risk in beef, chicken, pork, shelled eggs, etc. if the animal itself was fed a grain/wheat based diet?**

Meats and eggs are naturally gluten-free and safe to consume, regardless of whether or not the source animal consumed gluten-containing grain.

**For a manufacturer to use the term "naturally gluten free" in a food that is generally considered "naturally gluten free", is the manufacturer responsible to verify the product meets the FDA definition of <20ppm?**

Yes, the manufacturer must ensure that any potential cross-contamination or cross-contact does not exceed 20 ppm (or 10 ppm for a GFCO certified product).

**How would you define inherently gluten free?**

A product that is "inherently" gluten-free is one that is naturally gluten-free as part of its basic nature. See question above regarding labeling of naturally gluten-free products.

**What about gluten free labeling of personal care products, such as shampoo/lotions, etc.?**

Personal care products are not part of the FDA gluten-free labeling regulation (note that dietary supplements ARE covered in the regulation). Individuals on a gluten-free diet don't need to be concerned about gluten in products applied to the skin (e.g. lotion, shampoo), since the gluten



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protein is too large to be absorbed through the skin. It is of course possible to have skin sensitivities to other ingredients in personal care products.

### **What if a product has a generic GF logo without the "Certified" wording?**

Food manufacturers can use their own logos to indicate that a product meets the FDA 20 ppm threshold for gluten, but these claims are not independently verified. The official GFCO logo says "Certified Gluten-Free" with a GF in a circle. It is trademarked and should not be used unless given explicit permission following audit process and approval by GFCO. Please report logo violations to GFCO at [www.gfco.org/contact-us](http://www.gfco.org/contact-us), or by calling 253-833-6655.

### **Is starch highly processed like glucose, or can some gluten get into the starch if it comes from a gluten-containing grain?**

Wheat starch that has been sufficiently processed should contain <10 ppm gluten, but if the starch is not well processed there is a chance of residual gluten. We would recommend that persons with celiac disease stick to corn starch or other non-gluten starches if they are not using a GFCO certified starch.

### **What about wine that says it has been aged in rum barrels?**

Wine is considered to be gluten-free, whether aged in barrels or otherwise.

### **Should we be concerned about the smaller food manufacturers that are making gluten-free claims on non-certified products? Should we only be purchasing certified gluten-free products? Are "gluten free" labels safe?**

The major differences between gluten free products and GFCO certified gluten-free products are 1) the threshold (20 ppm for gluten-free products vs 10 ppm for GFCO products and their ingredients), and 2) the fact that GFCO certified products are independently monitored to ensure that they are gluten free. GFCO has very strict manufacturing requirements for certified products, requires each manufacturer to perform testing according to risk, and does regular surveillance of retail products. The FDA does not have the ability to monitor products like this, and typically only does testing when there is a consumer complaint.

### **Are you able to review if Cheerios is safe for those with Celiac?**

We don't certify Cheerios or audit the plant where they are made, so we cannot comment on their safety.



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## **Do companies have to submit test results periodically to GFCO?**

Yes, every company submits their testing results to GFCO, and must report any positive finished product results to GFCO immediately.

## **What about spices?**

Spices are still an area of concern for both gluten and allergens, but the American Spice Trade Association is working hard to clean up the spice industry, and is focusing on allergens and gluten. It is fortunate that spices are typically used in very small volumes, so the risk they present is reduced, but when in doubt stick to certified gluten-free spices.

## **Are there any safe vitamin brands?**

GFCO does certify a number of nutritional/supplement products, so look for those products.

## **What should I look for when buying nuts? Does the package need to say gluten-free?**

Plain nuts do not need to be certified or labeled gluten-free. Do avoid buying nuts from bulk bins due to risk of cross-contamination.

## **How can we push the USDA to improve the labeling?**

The USDA's primary focus is on naturally gluten-free foods with a low risk of gluten contamination – meat, poultry and eggs. While gluten is not a priority area for them, they do observe the FDA regulation for those companies that choose to use gluten-free labeling. USDA regulated products are another area where you should look for the certified GF logo.

## **Is Vitamin E okay if listed as an ingredient? Doesn't it sometimes contain gluten?**

Vitamin E is gluten-free. Confusion can arise because it is sometimes derived from wheat germ oil. However, the oil is highly processed and is free of gluten protein.

## **What about natural flavorings? FDA vs USDA? For example: raw ground turkey label says natural flavorings, since this is from the USDA, would you still choose the product?**

Yes, you could safely eat that product. USDA-FSIS regulation requires that animal or vegetable proteins must be specifically identified in the ingredient statement on the labels, and cannot just be called "natural flavor". The source of the protein must also be disclosed. On the label, you will read "hydrolyzed *wheat* protein" or "hydrolyzed *milk* protein," not just hydrolyzed protein. Things aren't quite as clear in the FDA regulations, but you can be sure that any natural flavor that contains wheat will be called out, and we have seen many instances of manufacturers highlighting flavorings that are made from or contain barley or rye.



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**Sometimes there isn't a certified product or one labeled gluten free available, and I have to choose a product based on reading the list of ingredients. Based on a review of the ingredient list the product appears to be okay, how safe are these products? Does the manufacturer need to be contacted in all instances? When is it safe to choose these types of products?**

Among products which appear to be gluten-free based on ingredient labels, some have a higher risk of cross-contamination with gluten, and are better avoided unless certified or labeled gluten-free. These products are: oats, lentils, and milled products made from grains, beans, seeds or legumes (e.g. sorghum flour, garbanzo bean flour, ground flax). Otherwise, products whose ingredients indicate they are gluten-free should be safe to consume, but choosing certified gluten-free versions provides an extra level of assurance.