



GLUTEN FREE WATCHDOG

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Allergen advisory statements for wheat do NOT appear to be useful predictors of the potential for quantifiable gluten in database reviews ^{1,2}

In the U.S., allergen advisory statements are *voluntary* and are not currently defined by any federal regulation. The FDA continues to state that allergen advisory statements must be truthful and not misleading. Precautionary labeling may include language such as, "May contain wheat," "Processed in a facility that uses wheat," and "Produced on equipment that also processes wheat." This terminology is allowed to be included on foods labeled "gluten-free." For consumers, such statements are understandably confusing and concerning. Adding to the confusion is the lack of understanding of the difference between **Contains** statements regulated under the Food Allergen Labeling and Consumer Protection Act and **May contain** statements that are not currently regulated.

There is very little published data on whether precautionary statements for wheat or gluten on food labels provide any indication about whether a food contains quantifiable gluten. However, the body of available data is increasing.

In a recently published 2018 analysis (1), labeling information was retrospectively reviewed from 328 products labeled gluten-free and tested for gluten through Gluten Free Watchdog, LLC.

- 297/328 products tested for gluten did NOT include an allergen advisory statement for wheat or gluten on product packaging.
- 31/328 products tested for gluten DID include an allergen advisory statement for wheat or gluten on product packaging.
- Of the 297 products that did NOT include an advisory statement, 39 contained quantifiable gluten at or above 5 ppm, including 12 products that tested at or above 20 ppm of gluten.
- Of the 31 products that DID include an advisory statement, 3 contained quantifiable gluten at or above 5 ppm, including 2 products that tested at or above 20 ppm of gluten.

In a 2016 analysis (2), labeling information was retrospectively reviewed from 101 products tested for gluten content through Gluten Free Watchdog, LLC. Products reviewed for this analysis were not labeled gluten-free but appeared to be free of gluten containing ingredients based on a review of the ingredients list.

- 87/101 products tested for gluten did NOT include an allergen advisory statement for wheat or gluten on product packaging.
- 14/101 products tested for gluten DID include an allergen advisory statement for wheat or gluten on product packaging.
- Of the 87 products that did NOT include an advisory statement, 13 contained quantifiable gluten at or above 5 ppm, including 4 products that tested at or above 20 ppm of gluten.
- Of the 14 products that DID include an advisory statement, only 1 contained quantifiable gluten (it tested at a level of gluten at or above 20 ppm of gluten).

Combining the data from both studies:

- ▶ **4/45 (9%) products that DID include an allergen advisory statement for wheat or gluten on product packaging contained quantifiable gluten.**
- ▶ **52/384 (14%) products that did NOT include an allergen advisory statement for wheat or gluten on product packaging contained quantifiable gluten.**

The FDA should strongly consider regulating allergen advisory statements, especially in light of the Food Safety Modernization Act.

Citation 1: Tricia Thompson, Amy Keller, Trisha B. Lyons. When foods contain both a gluten-free claim and allergen advisory statement for wheat: Should consumers be concerned? European Journal of Clinical Nutrition, advance online publication, 26 March 2018. doi:10.1038/s41430-018-0141-y. Available at <http://rdcu.be/JRMO> Summary available at <https://www.glutenfreewatchdog.org/news/wp-content/uploads/2016/10/2016-FNCE-AAS-flyer.pdf>

Citation 2: Tricia Thompson, Trisha B. Lyons and Amy Jones. Allergen advisory statements for wheat: do they help US consumers with celiac disease make safe food choices? European Journal of Clinical Nutrition advance online publication, 14 September 2016 doi:10.1038/ejcn.2016.155. Available at <http://rdcu.be/k11j> Summary available at <https://www.glutenfreewatchdog.org/news/wp-content/uploads/2018/03/2018-AAS-FINAL-one-pager.pdf>

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