



HIGHLIGHTS OF OUR PROPOSAL TO FSSAI

1. Key considerations were highlighted by us such as:
 - a. Presence of small quantity of gluten in food items and concerns regarding cross contamination, which need to be declared in the labelling
 - b. Aligning with the worldwide food standards and terminologies, as far as possible to make it easy for food manufacturers, exporters and consumers.
 - c. Provision for a stepwise or graded plan to facilitate industry to move towards gluten free claims.
 - d. Information on packaging of food products to be such that it is easily understood by the consumers.
 - e. Gluten free claims will be voluntary as per the Act but industry could be encouraged and urged to share information about gluten, for the benefit of celiac and other gluten intolerant patients.
 - f. Industry could also be encouraged to - provide suitable and substitute products at competitive prices and also consider setting up dedicated facilities for manufacturing gluten free items.
 - g. Products substituting important basic foods, should supply approximately the same amount of vitamins and minerals as the food they replace. (as has been specified in the Codex guideline)
 - h. Apart from the gluten free claims as per this act, changes are suggested in the labelling regulation too which could help provide more information to patients.
2. We have proposed two categories of claims: 'Gluten free' and 'No Gluten Containing ingredient' and have specified separate requirements for both these claims. Some of them are briefly mentioned below:
 - a. Definition of gluten defined as per internationally accepted and used standards
 - b. Acceptable level of gluten for 'gluten free' claim ($< 20\text{ppm}$)
 - c. Testing methods defined – Internationally accepted ELISA R5 Mendez method at an accredited lab, testing being mandatory for 'gluten free' claims
 - d. Good Manufacturing Practices (GMP) to contain risks due to cross contamination
 - e. Documentation
 - f. Certificates from ingredient suppliers
 - g. Random testing and audit by authorities

It is also proposed that all food items should be covered under this law, whether sold pre-packed, or not. This will include retail, bulk sales and all dining establishments. This should also include single unprocessed items like non gluten containing grains (millets), pulses, spices etc.

3. Apart from the gluten free claims, we have also recommended some other changes in the labelling regulations to include key allergens, which we propose be made mandatory for

all food products. This will help all patients with food allergies and will give the gluten intolerant patients more information to make an informed choice.

- a. Any ingredient in a food item which is an allergen (the allergens could include milk, soya, egg, nut, seafood, wheat and gluten) should be highlighted in the ingredient list.
 - b. If an ingredient is derived from an allergen/ is a form of an allergen, the allergen should be mentioned next to the ingredient.
 - c. 'Contains' statement should be present in addition to listing the allergen in bold in the ingredient list.
 - d. If the food item is manufactured in the same premises/line as a gluten containing item/ grain, 'manufactured in a facility/line that also processes gluten/wheat' to be mentioned, even if the food item is declared gluten free as per this act.
 - e. If there are chances of other allergens being present in the food item (due to cross contamination) apart from the allergens mentioned as per point a above, separate 'May also contain allergen X' statement should be mentioned. This will help patients with food allergies for whom consuming even a minute amount of the allergen concerned can be fatal. At the same time, this statement should be used by manufacturers only after a proper risk assessment of their manufacturing procedures such that it is not used unnecessarily by them.
 - f. Allergen declaration for dining establishments should also be considered at a later stage.
4. We have especially highlighted the usage of the word 'flour' in labelling. If wheat flour is used as an ingredient, we have suggested that it should be specified as 'wheat flour' and not only 'flour' as is labelled in some products presently. Even if wheat flour is present as an anticaking agent or for coating or any other purpose, it should be clearly mentioned in the ingredient list in the label.
 5. We have also suggested that some other areas of the Food act be re-looked at to benefit the celiac population.
 - a. In commonly used items:
 - Maida or wheat based products should not be used or permitted to be used in them, if can be avoided, or if not necessary. Some such items where it is suspected/being currently used, or/and seem to be permitted are heeng, dates, canned luncheon meat, canned chopped meat and icing sugar.
 - If permitted and used, then information should be provided to the consumer by labelling appropriately. In many commonly used items like custard powder, baking powder, caramel colour, yeast, guar gum, flavouring, colouring and spices, it should be clearly specified in the labelling if gluten is present or not.
 - b. In flours made out of non-gluten grains and pulses (including besan):
 - If gluten is intentionally present in these flours, even if in a small amount, it should be declared and labelled clearly in the ingredient list.
 - If gluten is not meant to be an ingredient in these flours, then all care should be taken to follow good manufacturing practices whereby cross contact with gluten should be totally avoided.
 - If the flour is milled on the same line/ facility as wheat, it should be clearly mentioned in the label.
 - c. Grains and Pulses - The permissible limit of 'other edible grains' allowed in cereal grains and pulses in the Act is 3% or more. That leaves a possibility of wheat or barley grain being present in non-gluten containing grains and pulses. This permissible limit

needs to be redefined keeping in view the harvest time and possibility of mixing of gluten containing grains with other grains and pulses.

- d. Spices – Preparation of spice powders should follow GMP to ensure that there is no gluten present in them in any form in any amount. If there is any chance of gluten being present in them, it should be clearly mentioned and labelled.
- e. Food additives
 - Food additives and preservative manufacturers should declare gluten free status of their products to their vendors after testing as per methods specified in this act.
 - If they have processed their products to an extent that they no more contain gluten, then it should be declared too.
 - Standard practices of manufacturing food additives to be made known to consumers so the source of some common additives is known, whether it's a wheat or a non - wheat based source.
- f. Use of gluten in medicines and nutrition supplements should be prohibited to make medicines safe for celiacs. This has been implemented in EU and is being demanded in USA too.