



ISDI Comments on
Draft Revised Standard for Gluten-free Foods
(CODEX STAN 118-1981, AMENDED 1983)
At Step 6 of the Procedure

Section 1. SCOPE

- ISDI suggests that it might be useful to **add** the sentence under section 1.3 of the current CODEX STAN 118-1981 FOR “GLUTEN-FREE FOODS”, which reads:

“This standard does not apply to foods which in their normal form do not contain gluten”.

Sections 2 & 3. DESCRIPTION & ESSENTIAL COMPOSITION AND QUALITY FACTORS

1. Comments on oats

ISDI noticed that “oats” is mentioned in the Draft revised Standard at five places in the text and that at three places it is in square brackets. Therefore, ISDI would like to suggest that the **advice of WGPAT is asked for the position of “oats”.**

2. Comments on the levels for gluten

ISDI recognises that the industry for gluten-free foods has been producing, for a significant number of years, naturally gluten-free foods that do not exceed a gluten level of 20 ppm, and wheat starch-based gluten-free foods that do not exceed a gluten level of 200 ppm.

ISDI recognises that, with progress over time, it has recently become possible to produce wheat starch based gluten-free foods with gluten levels not exceeding 100 ppm, although at this moment it is not clear if, in the long term, sufficient quantities of gluten-free wheat starch will be available to meet the needs of the entire gluten-free food industry.

ISDI supports the expert work of the Working Group on Prolamin Analysis and Toxicity (WGPAT) in their efforts to determine a suitable test method and in their work to determine the level of gluten of clinical significance to most coeliac consumers.

ISDI welcomes the new scientific work completed in an attempt to bring clarity to the issue of tolerable levels of gluten in patients with coeliac disease following a gluten-free diet, but

awaits the recommendations of the WGPAT since this scientific work is not definitive in suggesting a clinical level.

ISDI believes that a single limit for the maximum permitted gluten content should be adopted for all foods presented for coeliacs, taking into consideration current practice which provides consumer choice from both naturally gluten-free products and rendered gluten-free products, e.g. wheat starch based products.

Conclusion

ISDI requests that **CCNFSDU**, at this stage, **does not try yet to resolve the debate on clinical levels**, or set a safe maximum level of consumption, **without**:

- Recognising the recommendations of the WGPAT since the new clinical studies do not provide enough evidence to support a definite clinical level.

Section 3.1. ESSENTIAL COMPOSITION AND QUALITY FACTORS

ISDI requests that CCNFSDU **changes** “*on a dry matter basis*” to “*as consumed*”, taking into account the earlier CCNFSDU discussions on limits on an “*as consumed*” basis within the Standard.

Section 4. LABELLING

ISDI **would appreciate that WGPAT** be consulted for **guidance on the labelling** of gluten-free foods as required.