



24 October 2006

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

ISDI wishes to present additional comments to those made to Codex Secretariat (06/238) and reproduced in CX/NFSDU 06/28/5 (August 2006).

**1. Oats**

- ISDI hoped that the WGPAT may offer some advice on the position of consumption of oats for those with gluten intolerance. The comments made by the WGPAT, as reproduced in CX/NFSDU 06/28/5, provide no such advice on the consumption of oats.
- ISDI notes the comments made by Finland (to Codex, June 2006) to add a sentence to the Standard: *'Oats can nationally be accepted to be part of a gluten-free diet'*.

ISDI could support such a sentence to allow the acceptance of oats on a national level

**2. Clinical levels**

- ISDI requested 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.
- ISDI welcomes the comments made by WGPAT (in CX/NFSDU 06/28/5) and notes the reasonable compromise proposed i.e. for those foodstuffs
  - consisting or made from ingredients which do not contain any prolamins from wheat, rye, barley, [oats] or their crossbred varieties – *a maximum gluten level not exceeding 20 ppm*
  - or
  - consisting of ingredients from wheat, rye, barley, [oats] or their crossbred varieties, which have been rendered 'gluten-free' – *a maximum gluten level not exceeding 100 ppm*
  - or
  - any mixture of the two ingredients – *a maximum gluten level not exceeding 100 ppm.*

ISDI has always maintained it would support the recommendations of the WGPAT and thus will support this compromise proposal.

### 3. **Labelling statements**

- ISDI hoped that the WGPAT may be able to offer some guidance on the labelling of gluten free foods.
- ISDI notes the additional new paragraph on labelling, proposed by the WGPAT in their comments (in CX/NFSDU 06/28/5) i.e.

*”The term ‘gluten-free’ shall be given in the immediate proximity of the name of the product. If ingredients (starches) derived from gluten-containing cereals are present (rendered gluten-free), the botanical origin of the cereal from which the starch originates shall be stated in the ingredients list.”*

ISDI supports such a paragraph as a means of adding clarification in product labelling, as this is in line with the provision in the Codex Standard for the labeling of prepackaged foods (CODEX STAN 1-1985 (Rev. 1-1991) - Section 4.2.1.4) recently amended to require declaration of the cereal source of any gluten-containing starch used in the ingredients list.