



GLUTEN INTOLERANCE GROUP
of East Central Wisconsin

GLUTEN-FREE NEWSLETTER

http://bit.ly/GIGECW_Newsletters

Educate / Motivate / Advocate

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Meetings

When: Third Saturday of odd numbered months (Jan, Mar., May, July, Sept., Nov.)

9:00 am to 11:00 am

Where: Ripon Public Library in the Silver Creek or Nash Rooms.

Spouses and loved ones are also encouraged to attend.

Alan Klapperich,
Branch Manager

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If you've read any of my articles in the past, you know they can be detail-oriented.

I don't do this out of an inflated sense of self-importance or because I like the clicking sound of the keyboard. I do it because I feel the *information* is important.

One of my pet peeves are How-To articles that don't really tell you HOW to do it - particularly when it comes to the gluten-free lifestyle. They give you the 30,000 foot view on a topic that requires a microscope. How is that helpful?

I was a member of a large Facebook Celiac/Non-Celiac Gluten Sensitivity group. Members would constantly post pictures of products and ask if it was gluten-free. Other well-meaning members would reply with the answer. I would cringe because giving them a yes or no answer really wasn't helping them in the long run. Of course, I'd offer the answer along with information on label reading, but that went largely unacknowledged. Oh well, I can only "plant the seed", right?

"Give a man a fish, and you feed them for a day. Teach a man to fish, and you feed him for a lifetime" - Anne Isabella Thackeray Ritchie

"Teach a man how to teach others to fish, and you feed a nation." - Will Luden

We've all heard the "Give a man a fish..." proverb. It offers some valid truth that I've tried to follow over the years. As I was panicking about what to write here in "Gluten-Free Thoughts", I stumbled across the quote from Mr. Will Luden. His words struck a chord with me.

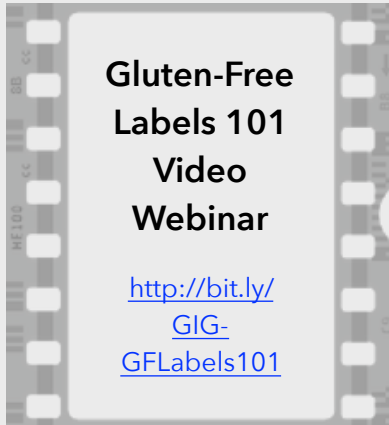
This concept is exactly what the gluten-free community needs. While we still need to be helping and teaching people how to be gluten-free, we also need to be teaching them how to help others be gluten-free. Yes, it takes a village...



Peace and blessings,

Alan Klapperich
GIG of ECW Branch Manager

Label Reading Resources



Q&A Gluten-Free Labels 101 PDF

<http://bit.ly/GIG-QA-GFLabels101>

Gluten-Free Label Reading

<http://bit.ly/GIG-LabelReading>

3 Tips for Gluten-Free Label Reading

<http://bit.ly/GIG-3TipsGFLabels>

Getting Started on a Gluten-Free Diet

<http://bit.ly/GIG-GettingStarted>

Gluten-Free Label Reading

Alan Klapperich
GIG of ECW Branch Manager

OK, true confession time. Before 2003 I rarely looked at a product's ingredient label. I saw no point in it; if it tasted good - I ate it. Hmm, could this have been a contributing factor in my steadily increasing weight and my rapidly declining health? Yeah...

***"It's the little details that are vital.
Little things make big things happen."***

- Coach John Wooden

It should be no surprise that success in the gluten-free lifestyle is found in the details. After all, our lives have been rearranged by something measured in parts per million. Talk about little things making big things happen. Coach Wooden's words take on a whole new meaning for those with a gluten-related disorder.

Knowing what's in our food is probably one of the most important details. President Theodore Roosevelt signed into law the Pure Food and Drugs Act of 1906. Known as the Wiley Act, it gave the federal government the power deem a food "misbranded" if ingredients were "false or misleading", or deemed "adulterated" if it contained ingredients harmful to health. Sadly, it would take nearly a century before presence of food allergens would be recognized. A decade later, gluten-free regulations finally make it on the books.

See the Page 4 Sidebar for a history of food labeling.

The Protection Agencies

Food safety is regulated by a few different governmental agencies. For the purpose of this article, we'll be discussing the

More Label Reading Resources

BeyondCeliac.org "Reading Food Labels"

<http://bit.ly/2AZYuoc>

Celiac Disease Foundation "Label Reading and the FDA"

<http://buff.ly/2qOf1La>

Gluten-Free Living "How to Read a Food Label"

<http://bit.ly/2FBxPkR>

Gluten-Free School "Guide to Understanding GF Labeling"

<http://bit.ly/2D1ZB8J>

Gluten-Free School "Why You Should (Almost) Never Look for Gluten on the Ingredients Label"

<http://bit.ly/2AZJ1o9>

GF Label Reading - Continued

[US Food and Drug Administration](#) (FDA) and the [US Dept. of Agriculture](#) (USDA). Beverage alcohol [as in gluten-free beer] is regulated by [US Treasury's Alcohol and Tobacco Tax and Trade Bureau](#) (TTB) - sorry beer lovers, we won't be getting into those regulations in this article.

FDA vs USDA

The FDA regulates most packaged foods we see on the store shelves. The USDA regulates meat, poultry and egg products, and mixed food products that generally contain more than three percent raw meat or two percent or more cooked meat or poultry (e.g. soups, chilis, frozen entrees).

While USDA regulated products are encouraged to follow FDA regulations, it is not required. [*This is important information to know when it comes to reading ingredient lists. More on this later.*]

It's estimated that 80% to 90% of USDA products voluntarily comply. If you see a "Contains" statement or other indication on a USDA product, major food allergen will be plainly listed.

FDA & the Top 8 Food Allergens

The FDA's [Food Allergen Labeling and Consumer Protection Act of 2004](#) (FALCPA) requires food labels to clearly identify the food source names of all major food allergens used to make the food. They must use the common or usual name of an ingredient [e.g. Modified Food Starch (wheat)] or use a "Contains" statement next to the ingredient list. [e.g. Contains Wheat, and Milk]



Did you know?

Before the passage of FALCPA in 2004, food manufacturers **were not required** to inspect or label their products for allergens.

History of Food Labeling

FDA

History of the FDA

<http://bit.ly/2EPCnTD>

Food & Drug Law Journal

"Food Allergen Law & FALCPA of 2004 - History of Food Allergen Law"

by Jonathan B. Roses

<http://bit.ly/2D90DmB>

Institute of Medicine of the National Academies

"Front-of-Package Nutrition Rating System and Symbols - History of Nutritional Labeling"

<http://bit.ly/2FDthKK>

EatingWell.com

"A History of What Is Required on Food Labels and the Nutrition Facts Panel"

by Hemi Weingarten

<http://bit.ly/2r96aos>

Fooducate.com

"1862 - 2014: A Brief History of Food and Nutrition Labeling"

<http://bit.ly/2FBFxFxLR>

GF Label Reading - Continued

What are the [major allergens as defined by the FDA](#)?

- Milk
- Eggs
- Fish (bass, flounder, cod)
- Crustacean shellfish (crab, lobster, shrimp)
- Tree nuts (almonds, walnuts, pecans)
- Peanuts
- Wheat (including all types: durum, spelt, emmer, farina, farro, einkorn)
- Soybeans



Source FDA: <http://bit.ly/FDA-Big8>

You'll notice the Top 8 list above only includes wheat. It does not include gluten-containing ingredients barley (malt), rye, or oats*. Fortunately, barley is most commonly listed as "barley," "barley malt," or simply "malt". Rye is rarely used in a form other than flour and would appear in the ingredient list.

**Oats (and products that contain them) that are not specifically certified or labeled gluten-free are off-limits to anyone following a gluten-free diet. They are a high risk ingredient because they are exposed to substantial amounts of gluten via cross-contact from field to packagings. Oats require additional knowledge and careful consideration.*

For an in depth look at oats, please see:

GIG of East Central Wisconsin's

"What Oats Through Yonder Package Breaks?"

<http://bit.ly/GIGECW-PureOats>

Food and Drug Administration Links

"How to Understand and Use the Nutrition Facts Label"

bit.ly/FDA-NutritionLabel

"Food Allergies: What You Need to Know"

<http://bit.ly/FDA-Big8>

"Food Allergen Labeling And Consumer Protection Act of 2004 Questions and Answers"

bit.ly/FDA-QA-FALCPA

"Gluten-Free Labeling of Foods"

bit.ly/FDA-GFLabeling

"Questions and Answers: Gluten-Free Food Labeling Final Rule"

bit.ly/FDA-QA-GF-Labeling

GF Labeling - Continued

The Ingredient Label

Nutritional labeling offers up a wealth of important information, however, it does not relate to gluten. The ingredient list is our main area of interest. Here we will find all the ingredients used in the product listed in descending order based on weight. This means an ingredient weighing the most will be first and the ingredient weighing the least will appear last.

The ingredient label is your frontline defense in determining the gluten-free status of a product. An important fact to know: FALCPA labeling regulations do not apply to the potential or inadvertent presence of food allergens resulting from cross contact. Cross-contamination of a food or ingredient can occur at harvest, transport, manufacturing, or packaging. Calling the manufacturer may be required not only for ingredient clarification, but also to determine manufacturing practices.

Cross-contact and Good Manufacturing Practices

Manufacturers are encouraged [not required] to follow Current Good Manufacturing Practices (CGMP). Part of CGMP means developing and executing food allergen control plans. The plan must address six elements: training of processing and supervisory personnel, segregation of food allergens during storage and handling, validated cleaning procedures for food contact equipment, prevention of cross-contact during processing, product label review and label usage and control, and a supplier control program for ingredients and labels.

Allergen Advisory Statements

"May Contain", *"Processed in the same facility as"*, or *"Processed on the same equipment as"* are known as Food Allergen Advisory statements. They are voluntary and are not regulated, unlike the required "Contains" statement for food allergen ingredients. According to the FDA, companies may use

TIP:

Keep ingredient lists short.

Ever see a label on head of broccoli?

Links



"Allergen Advisory Statements for Wheat: NOT a Useful Predictor of Gluten Content"

<http://bit.ly/2D7SeMI>



"May Contain - Voluntary Advisory Statements"

bit.ly/GIGECW-MayContain

"Confusing Ingredients"

bit.ly/GIGECW_ConfusingIngreds

GF Labeling - Continued

advisory statements as long as they are "truthful and not misleading".

Gluten-free experts and [third-party testing](#) tell us Food Allergen Advisory statements are not useful in determining the gluten-free status of a product.

You may find a product labeled "Gluten-Free and/or Wheat-Free" or even bears a GFCO gluten-free certification logo that has a Food Allergen Advisory statement that includes wheat.

Yes, this product is in compliance with current FALCPA labeling laws.

For products not certified gluten-free, call the manufacturer to ask questions. Ask about the facilities, the production lines, and their policies, procedures for allergen handling, and testing protocols. If they do not answer the questions to your satisfaction, find another manufacturer with a similar product that does meet your needs.

The Definition of Gluten-Free

As we discussed above, FALCPA does not directly address gluten. Before the FDA could create regulations regarding "gluten-free", they needed to define what "gluten-free" means. It took ten years for the definition to finalize, but the voluntary gluten-free labeling regulation went into effect August 5th, 2014.

The FDA's definition of "gluten-free," "no gluten," "free of gluten," or "without gluten" is as follows:

"...the food either is inherently gluten free; or does not contain an ingredient that is: 1) a gluten-containing grain (e.g., spelt wheat); 2) derived from a gluten-containing grain that has not been processed to remove gluten (e.g., wheat flour); or 3)

Did you know?

- "Contains" statements address the top eight food allergens found in the product as ingredients. (Mandatory)
- "May Contain" statements address potential, inadvertent cross contamination due to processing/ packaging. (Voluntary)
- Gluten-Free labeling supersedes voluntary advisory statements.



"Allergen advisory statements for wheat: do they help US consumers with celiac disease make safe food choices?" by Trisha B. Lyons, and Amy Jones.

They analyzed allergen advisory statements of 101 products (not labeled gluten-free, but lacked gluten ingredients) previously tested for gluten content by Gluten-Free Watchdog. Here's what they found:

- 87/101 (86%) products tested for gluten did NOT include an allergen advisory statement for wheat or gluten on product packaging.
- Fourteen products (14%) 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 (15%) contained quantifiable gluten at or above 5 ppm including 4 products (5%) that tested at or above 20 ppm of gluten.
- Of the 14 products that DID include an advisory statement, only 1 (7%) contained quantifiable gluten at or above 5 ppm.

SUMMARY

On the basis of this analysis, the current use of allergen advisory statements for wheat or gluten are not useful predictors of whether or not a single or multi-ingredient food product contains 20 or more p.p.m. of gluten. Precautionary statements should be regulated and standardized so that they are helpful to the consumer.

A handy one page summary of the study. <http://bit.ly/2DnbN8h>

GF Labeling - Continued

derived from a gluten-containing grain that has been processed to remove gluten (e.g., wheat starch), if the use of that ingredient results in the presence of 20 parts per million (ppm) or more gluten in the food. Also, any unavoidable presence of gluten in the food must be less than 20 ppm."

Source: <http://bit.ly/FDA-QA-GF-Labeling>

Notice the last sentence of the definition: "*Also, any unavoidable presence of gluten in the food must be less than 20 ppm.*" This means cross-contact.

I hear you..

"Whoa, this is really confusing and complicated. Isn't there an App?"

Sure, there are several but we're not covering them in this [label reading](#) article. We're downloading the best app into your brain this very second - it's the knowledge you are acquiring. Labeling reading is an important (required) skill if you consume packaged/processed foods. It could mean the difference between sickness and wellness.

Websites, published lists, and apps that report a product's gluten-free status are excellent tools to help narrow down product selection. Please do not use them as the sole means to determine the gluten-free status.

Companies change product ingredients at will, generally without notice. Those changes will be reflected on the product's label. Most companies will refer you to the ingredient list found on the product for the most up to date information. A published list (on paper or electronic form) is only as accurate as its most recent update.

Knowledge = Health

The most important tool you can have is **KNOWLEDGE.**

The more you know about yourself, about your food, about this condition, the healthier you will be.

Notes

GF Labeling - Continued

Reading the label. Finally!

1. Look for a third-party gluten-free certification mark - like GFCO's.

- [Gluten-Free Certification Organization](#) requires all finished products and individual ingredients using the GFCO logo contain 10 parts per million or less of gluten.
- Know your certification organizations. When companies mark their products as GF it may appear as if they are actually certified. It might simply be a logo from their marketing or package design department.



2. Read the ingredient list. Yes, even certified products. If you see any of following ingredients, the product is not gluten-free.

- Wheat (including durum, spelt, emmer, farina, farro, einkorn)
- Rye
- Barley
- Oats (unless certified gluten-free)
- Malt
- Brewer's Yeast
- Ingredients needing verification:
 - Yeast Extract - this could be [a by-product of the beer brewing process](#). Verify with manufacturer in non-GF labeled products.
 - Vinegar - FDA defines the single word "vinegar" to mean apple cider vinegar. However through the certification process, [GFCO has encountered some usages of malt vinegar labeled as "vinegar"](#). Remember barley/malt is not required to be disclosed. Not a large area of concern, but if you are unfamiliar with a manufacturer or product, it might be a good idea to inquire about the source of their vinegar. Better safe than sorry.

3. USDA Products - Products are not required to comply with FDA's FALCPA regulations. If you see a "Contains" statement (or some other wording) that a package is complying with FALCPA, you know wheat must be declared. If you **do not** see a "Contains" statement, you'll need to verify the source of these ingredients (they could come from wheat):

- Starch
- Food Starch
- Modified Food Starch
- Dextrin



Congratulations!

You've made it! I hope I've increased your knowledge on this multi-layered subject.

National Public Radio

"FDA Takes Too Long To Recall Tainted Food, Federal Investigators Say"

by Doreen McCallister
12/28/17

"Contaminated food is taking too long to be removed from store shelves, according to a report issued by the inspector general of the Department of Health and Human Services.

The report says the Food and Drug Administration "did not always have an efficient and effective food-recall process that ensured the safety of the nation's food supply."

Federal investigators reviewed 30 of 1,557 food recalls between 2012 and 2015.

The investigation shows food companies took an average of 57 days to recall items after the FDA was informed of the potential danger.

The inspector general's office said the review was conducted "to determine whether FDA is fulfilling its responsibility in safeguarding the nation's food supply now that it has mandatory recall authority."

The reports show the FDA has used its recall authority twice."

<http://bit.ly/NPR-FDA-Recalls>

Facial Misbranding Petition to the FDA

Alan Klapperich
GIG of ECW Branch Manager

Disclaimer

Neither Gluten Intolerance Group, Gluten Intolerance Group of East Central Wisconsin, or Alan Klapperich took part in the crafting of this petition.

Unfortunately, food labeling mistakes happen. Sometimes it's due to accidental human error - a gluten product ends up in gluten-free packaging or an ingredient is omitted in the ingredient list. Sometimes it's due to the manufacturer's lack of knowledge, a misunderstanding or confusion over ingredients or labeling regulations.

Sadly, the gluten-free community is experiencing far too many incidences of "facial misbranding" [a product bears "gluten-free" labeling, but the ingredient list includes a gluten containing item - like malt].

The FDA is responsible for policing and managing labeling infractions, but [corrective actions have been inconsistent - either slow in issuance, or not issued at all](#). This means tainted products remain in circulation.

"What can we do about product safety?"

Speak up! In order to make our voice heard, Tricia Thompson and Kaki Schmidt crafted a citizen's petition to the FDA encouraging them to enforce their gluten-free labeling rules.

Time is running out. The comment period closes February 19th, 2018. If you haven't done so already, please consider making your voice heard. In light of the [Office of the Inspector General's recent review of the FDA's efficacy](#), we need to **SPEAK LOUDLY!** This petition has received the support from Beyond Celiac, National Celiac Association, Center for Science in the Public Interest, and many individuals.

TIP: Use a computer to visit the FDA's website. It doesn't like mobile devices (e.g. smartphones)

To find out how to comment including a sample comment to copy & paste, visit Gluten-Free Watchdog's website:

<http://bit.ly/GFWD-StopLbViolations>

**GLUTEN-FREE
COMMUNITY
UNITE!**

*Support GFWD's FDA Citizen Petition
to End Labeling Violations
under the Gluten-Free Rule*

**#EnforceGFRule
#ReclaimGF**

Tax Deduction Links:



Celiac Disease Foundation

"Tax Deductions for Celiac Disease"

<http://bit.ly/2mKhfa8>

Kiplinger

"Can You Take a Tax Break for Going Gluten-Free?"

<http://bit.ly/2rgROCP>

BeyondCeliac.org

"Tax Deduction Guide for Gluten-Free Products"

<http://bit.ly/2DpRJ4a>

National Celiac Assoc. (formerly Celiac Support Assoc.)

"Can You Take a Tax Break for Going Gluten-Free?"

<http://bit.ly/2FOZAXp>

Tax Deductions for the Gluten-Free

Alan Klapperich
GIG of ECW Branch Manager

*"Let me tell you how it will be
There's one for you, nineteen for me
'Cause I'm the taxman, yeah, I'm the taxman"*

"Taxman" by George Harrison

Did you know if you are gluten-free out of medical necessity, you are allowed tax deductions? Yep, but there are some requirements. Here's a quick summary:

Am I qualified?

1. Medical expenses must exceed 10% of your Adjusted Gross Income.
2. You must itemize your deductions on your Federal return - no standard deduction.
3. Can't double-dip. Can't take a deduction if you paid with funds from your Health Savings Accounts or Flex Spending Arrangement.

What can I deduct?

1. Only the cost difference between GF and Non-GF foods. Example: GF bread: \$6.75. Non-GF bread: \$2.00. You can deduct \$4.75.
2. Full cost of speciality foods can be deducted. Example: Xanthan Gum - an ingredient used in baked goods.
3. If you make a special trip to buy GF foods - cost of transportation to/from store is deductible. Same applies to shipping/delivery fees for GF foods.

What do I do?

1. Consult your tax professional about this.
2. Get your diagnosis in writing from your doctor.
3. Save your receipts from GF foods.
4. Calculate your deduction amount.
5. File using [Form 1040, Schedule A](#).

Disclaimer

Gluten Intolerance Group of East Central Wisconsin or Alan Klapperich are not providing tax advice and this information does not substitute for consulting with your tax professional.