



FOR FOOD MANUFACTURERS: SOME HELPFUL INFORMATION ABOUT INGREDIENTS CONTAINING GLUTEN

Thank you to the various food manufacturer alliances who have issued statements in response to FDA’s temporary policy -- [COVID-19 Food Labeling Flexibility Guidance for Industry](#) -- including that any formulation change will not include gluten or allergens and that “substitution will be communicated to the consumer on a manufacturer’s website or at point-of-sale.” ([May 28, 2020 Food and Beverage Issues Alliance Statement on Ingredient Flexibility.](#))

While most manufacturers know that “**wheat**,” “**barley**,” and “**rye**” are gluten-containing grains, there are many ingredients that derive from these three grains and contain gluten. This list flags some “**hidden sources of gluten**” that do not contain the words “wheat,” “barley,” or “rye.”



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Ingredients Containing Gluten

Do not substitute any of the following for a gluten-free ingredient:

1. **Malt** (barley by definition unless another source is named)
2. **Malt extract** (barley by definition unless another source is named)
3. **Malt syrup** (barley by definition unless another source is named)
4. **Malt vinegar** (barley by definition unless another source is named)
5. **Beer** (contains malt unless labeled gluten-free)
6. **Spent brewer's yeast** (by-product of beer brewing)
7. **Yeast extract** (might be spent brewer's yeast)
8. **Dry smoke flavoring** (might use barley malt flour as a carrier)
9. **Soy sauce** (if wheat is listed as a sub-ingredient OR if a sub-ingredients list isn't provided)
10. **Single ingredient oats/oat flour not labeled gluten-free**

For additional information on **FDA's position on substitutions involving gluten** during the pandemic, please read [FDA's June 16, 2020 letter](#) in response to our [June 3, 2020 letter](#) from seven professional and patient/consumer advocacy groups concerned about the dangerous impact of substitutions involving gluten without label changes:

FDA's temporary policy does not provide labeling flexibilities to industry if a health or safety issue would result, including the substitution of an ingredient containing gluten for a gluten-free ingredient ... We directly state in the COVID-19 Food Labeling Flexibility Guidance that such flexibilities are not to be used when they may pose a health or safety issue. This would include the introduction of an ingredient containing gluten. Substitutions, in any amount, are not appropriate without a corresponding label change when the substituted ingredient is one that may cause a safety concern.

For additional information on **products displaying the term "gluten-free,"** please see FDA's [Questions and Answers on the Gluten Free Food Labeling Final Rule](#) and FDA's [Proposed Rule for Gluten-Free Labeling of Fermented or Hydrolyzed Foods](#).

For additional information regarding **celiac disease** – for which the only treatment is strict adherence to a medically-prescribed gluten-free diet -- we welcome you to contact any of the organizations above.

Thank you for your help ensuring that labels will continue to list ingredients that are considered unsafe for many Americans.