

FOOD LABEL READING FOR WHEAT & GLUTEN WITH PEAL

Plain English Allergen Labelling Australia & New Zealand



Dr. Kim Faulkner-Hogg
Advanced Accredited Practising Dietitian



© 2023 Kim Faulkner-Hogg
This guide cannot be reproduced without permission from Kim.



www.glutenfreenutrition.com.au



kim@glutenfreenutrition.com.au



[@DrKim.GlutenFreeNutrition](https://www.instagram.com/DrKim.GlutenFreeNutrition)

Updated February 2024

Label Reading for Gluten

In Australia and New Zealand

In 2021 Australia and New Zealand started rolling out new **Plain English Allergen Labelling standards (PEAL)**. The idea behind this is to use commonly known words — Plain English — for allergens, so they can be easily identified. This means that

- Albumin as an ingredient needs to be identified as **egg**
- Spelt needs to be identified as **wheat**
- Casein needs to be identified as **milk**
- And the presence of **gluten** — now for the first time — **needs to be declared**

From February 2024 onwards, Manufacturers **MUST** use the new labelling system on their product. If a manufacturer used the OLD label system on a food made and packaged before February of 2024, that food label will be legal — and can sit on our supermarket shelves — until February of 2026, when all the foods then need to be compliant with the new labelling system. Many labels have made the change, but total compliance is still 2 years off.

Wheat is listed as an **allergen**.

This means that it stimulates an IgE-mediated wheat allergic reaction in some people.

Symptoms are usually itchiness, hives, irritation of mouth and throat, vomiting, diarrhoea, sinus blockage and if severe; breathing difficulties and anaphylaxis, where the body goes into shock and starts to shut down.

There are different strains of wheat. Some of these include:

- Atta, Durum, Einkorn, Emmer, Khorasan/Kamut, Spelt.
- Triticale is a hybrid of wheat and rye

All wheats contain gluten.

Gluten will be listed for people with **coeliac disease** where damage to the small intestine and symptoms are experienced. It is not an allergic reaction.

Gluten is a name given to describe a particular part of the proteins found in **wheat, rye and barley** grains, and ingredients derived from these grains.

Less than 10% of people with coeliac disease develop an immune reaction to oats. But because this is possible in some people with coeliac disease, **OATS will NOT be labelled as gluten free in Australia or New Zealand.** Here oats will still be described as gluten containing on food labels.

Oats has a separate explanation later in this document.

B Barley

R Rye

O Oats

W Wheat

There are 4 gluten containing grain names you need to learn.

It is mandatory for food labels to tell you which ingredients came from gluten containing grains — even if that ingredient is so refined it no longer contains detectable gluten.

These are the 4 names you will be looking out for on the label. **Remember this acronym to help you.**

NB: The manufacturer does NOT need to inform you about the source of an ingredient if it came from a gluten free grain.

There are 3 parts on a food label to read.

1. Ingredient List:

Here the manufacturer writes down all of the ingredients they used in the product. In the Ingredient List the manufacturer can tell you, for example, that spelt is one of the ingredients used.

SPELT Example:

Many people are unaware that spelt is a type of wheat and as such it also contains gluten. The name SPELT, therefore may not be recognised by either wheat allergic people or people with coeliac disease.

Now with PEAL, it will be written as *spelt (wheat)* in the ingredient list.

This declaration now makes it clear that spelt is a type of wheat. The word wheat must be written in bolded type.

The names corn and maize refer to the same thing. Traditionally the European continent referred to this grain as corn and those from the America's referred to it as maize. The names can be used inter-changeably.



STARCH (Barley) Example:

It is mandatory in both the old and new food standards for the manufacturer to list the name of the BROW gluten-containing grain the ingredient was refined from.

Under PEAL, the gluten BROW grain name must be written in bold type, so it stands out more clearly. Old labels don't always bold.

If starch derived from barley is used, then *starch (barley)* will be written in the ingredient list to inform you that this ingredient (starch) was refined from the gluten-containing grain barley. The ingredient can be more descriptive here, than in the Contains Statement.

Starch could also come from wheat, corn (maize), tapioca and other grains. So by default, if an ingredient has been refined from a gluten-free grain source — **that gluten free grain source does not need to be declared.**

So if you see — *starch* — with no BROW grain name written beside it, this means that ingredient has come from a gluten free source grain (most often corn/maize) and can be eaten.

Other examples you could see include:

Derived from a gluten-containing grain

starch (**wheat**)
malt extract (**barley**)
thickener (**wheat**)
caramel colour (**wheat**)
glucose syrup (**wheat**)

Derived from a gluten-free grain (grain undeclared)

starch
malt extract (occas it could come from rice)
thickener
caramel colour
glucose syrup

2. Contains or Allergen Statement:

The Contains Statement is where it is **mandatory** for the manufacturer to list all the **food allergens** used in a product. This includes nuts (now to be listed by name), egg, milk, fish, crustacea, mollusc, wheat and soy. The word 'allergy or allergen' does not need to appear. The 'CONTAINS' statement, means the allergy declaration.

What is new under PEAL:

- The presence of **gluten** will now be declared
- **ONLY** the words **wheat and gluten** can be used in the **Contains** statement, to describe problem **BROW** grains.



Wheat is listed to warn those who are wheat allergic and **Gluten** will be listed to warn those with coeliac disease.



SPELT Example:

The word spelt will no longer be allowed to be used in the **Contains** statement.

Wheat, Gluten will be listed instead.

This is because spelt is a type of wheat and it contains gluten

OLD LABEL

Ingredients: Spelt, water, salt

Contains: Spelt

NEW LABEL

Ingredients: Spelt (**wheat**), water, salt

Contains: **wheat, gluten**

*Please note here that sometimes the old label might actually list spelt as **wheat**. From the point of view of the old label it was actually clearer if the manufacturer did that. Old labels do not list gluten. If you are looking at an old label, there is an expectation that you know that spelt and wheat contain gluten and you need to avoid this with coeliac disease.*

*The new labels list **gluten** and you will be looking to avoid products with **gluten** listed on them. Potentially if **gluten** is not there you might not know if you are looking at an old or new label.*

*If you are reading an old label and you see words like **wheat, barley, oats, rye**: - there is an expectation that you know these words and that they contain **gluten**.*

Although the percent of old labels in supermarkets from 2024-2026 will be low, it is a potential problem until February 2026 when labels will be fully compliant

OLD LABEL

Ingredients: Spelt, water, salt

Contains Statement: **wheat**

Starch (barley) Example:

Under PEAL, only the word **Gluten** will appear in the **Contains** statement to describe **non-wheat, gluten-containing BROW grains (rye, barley and oats)**.

Barley is not an allergen, so that grain name cannot be used in the Contains/Allergen Statement.

However, **barley does contain gluten** and if gluten is present in the product, gluten will be listed here in the Contains Statement.

OLD LABEL
Ingredients: Starch (barley) water, salt
Contains: cereals containing barley

NEW LABEL
Ingredients: Starch (**barley**) water, salt
Contains: **Gluten**

Ever since you can remember you have been avoiding a food that declares the presence of wheat, rye, barely & oats.

With PEAL in place, if you have coeliac disease, you are now avoiding the foods that declare the presence of gluten.

We teach that some ingredients derived from wheat (or BROW grains) are so refined that they no longer contain any detectable gluten and can therefore be eaten by people with coeliac disease. For many years, to help you identify those ingredients dietitians have been recommending that you purchase the **Coeliac Australia Ingredient List Booklet and phone App**, based on their Ingredient List booklet, to help you interpret a food label for gluten.

For many years this Booklet has been guiding people about which food ingredients are unsafe and which are safe. They use 3 symbols to inform you.

- Contains small or large amounts of gluten and needs to be avoided
- Naturally gluten free ingredients or they have been derived from naturally gluten free grains
- Ingredients refined from a BROW gluten containing grain AND are so refined that they no longer contain any detectable gluten. They can be eaten. Eg- wheat glucose syrup, wheat caramel colour. More are mentioned further along in this document.



Let's discuss definition. If you see in the **ingredient list** — **caramel colour (wheat)** — Under the old label you will need to look up the Coeliac Australia's Ingredient List booklet to determine if this is a 'box with the tick' ingredient or not.

It is — this means it is an ingredient processed from wheat that is so refined it no longer contains any detectable gluten. It can be eaten by people with coeliac disease.

- Caramel colour
- Caramel colour (wheat)

Take a look over page to see how PEAL will deal with this type of ingredient.

PEAL will replace the need to use this booklet.

This may be another point that is not fully reliable until February of 2026.

Caramel Colour (wheat) Example:

With PEAL

The Ingredient List declares that caramel colour came from **wheat**.

The Contains statement — will just list **Wheat**

This will notify the **wheat** allergic people.
There will be NO declaration of **gluten**, because the ingredient is so refined there is no gluten left.
Therefore it does NOT need to be declared.
It is safe to eat with coeliac disease.

NEW LABEL

Ingredients: sugar, starch, water, caramel colour (**wheat**).

Contains: **wheat**

When GLUTEN is not in the Contains statement, it means that **anything derived from wheat in the ingredient list no longer contains any detectable gluten**. This replaces this



The following are suitable ingredients, even if wheat derived:-

- Sugar syrups: *glucose, sucrose, fructose, maltose, dextrose
- Sugar alcohols: sorbitol, maltitol
- Food additives:
 - 150 Caramel colour
 - 575 glucono delta-lactone
 - 620-625 glutamate flavour enhancers
 - 1100 amylase
 - Food colours
- Wheat germ oil
- Wheat grass
- Distilled alcohol & vinegars
 - Except malt vinegar

*Wheat derived glucose is exempt from allergen labelling declaring it came from wheat.

If you see 'Glucose Syrup', it may still be wheat derived.

Please note:- Wheat derived glucose remains suitable for people with coeliac disease, as it is very highly refined. It can be eaten.

*Manufacturers **can** still choose to identify if their glucose syrup came from wheat, so sometimes you will still see this on a label. glucose syrup (**wheat**) or **wheat** glucose syrup They can be eaten.*

Now that we have reached 2024, please note that there are still several labels that have not fully embraced PEAL, and GLUTEN has not always been declared where it should be. Wheat is being declared, where wheat and gluten should be declared.

Therefore, Coeliac Australia's Ingredient List booklet should still play a role in helping you to interpret and food label.

3. May Contain Statement:

A May Contain Statement is a voluntary statement.

No changes have been made to this voluntary declaration under PEAL. A recent study suggests that about 74% of Australasian manufacturers¹ add a 'may contain' or 'may be present' statement to their product; warning that one of more allergens may be present through cross contact.

Most warnings are about wheat and nuts.

This does not mean the allergen is present, but it suggests it may not be safe, because there is a risk it might be.

A different study tested for traces of nut, egg and milk allergens in products that had 'may contain' statements. They found that 95% of the products did not contain the allergen in the warning².

While the safest option may be to avoid these, each person should use their own discretion with these products. Discuss with your dietitian or health care team how it is best to approach these statements for your situation.

OATS

You may be noticing the increasing messages about oats when eating gluten free. Let's try to clarify this a little.

Less than 10% of people with coeliac disease may develop an immune reaction or some level of inflammation to their villi from oats³.

Overseas— ONLY oats grown under special conditions to minimize their cross contact with wheat, rye and barley grains **can be called gluten free**. Overseas these oats must also be tested to show they **contain less than 20ppm of gluten**.

Only this type of specially grown oat should be eaten by people with coeliac disease.

If you wish to include oats, **it is strongly recommended that you discuss this with your Health Care team** and follow their recommendations for including them and monitoring acceptance.

LABEL example 1

Ingredients: almonds, sultanas, peanuts, sugar, water

Contains: almonds, peanuts

Made in a factory that processes wheat

LABEL example 2

Ingredients: rice flour, eggs, sugar, flax seed, salt

Contains: egg

May Contain: wheat and gluten

OATS cannot be called gluten free and will not appear in a food labelled gluten free in Australia.

In Australia these specially produced oats can be called WHEAT FREE, UNCONTAMINATED or PURE.

Avoid if the manufacturer declares that wheat, rye or barley may be present.

Be aware that even these Pure, Wheat Free oats will list GLUTEN in the 'Contains Statement'. This is because oats cannot be called gluten free in Australia.

It will be confronting to see this, but these oats can be eaten by people with coeliac disease.

Ingredient List: Wheat Free Oats

Contains: Gluten

Note if oats are declared *wheat free*, they must always say *wheat free oats* in the ingredient list. Suitable organic oats must say they are *wheat free* and organic *oats*.

Gluten Free Trademarks & Food Standard Regulations

Australia and New Zealand have one of the strictest food standards for gluten in the world.

To label food gluten free in Australia:-

A food can have no detectable gluten which is currently less than 3 parts per million (ppm). There can also be no oats or barley malt or ingredients derived from them.

We have a pretty trustworthy labelling system in Australia and if you see the words **Gluten Free** on a product, you will not need to read all of the ingredients. This can help to fast track your shopping. Though it's always a good idea to read new products and check them periodically.

Gluten Free Trademarks help to distinguish and rapidly identify, food that is certified to be gluten free. This Australian symbol on a product means that **Coeliac Australia** has reviewed the specks of the product and it communicates that they are satisfied with its gluten free production and on-going safety.

Manufacturers purchase the symbol from Coeliac Australia. Usually this is done by larger companies.

If an overseas company wishes to sell a food in Australia with a label that says it is gluten free. **The products need to comply with the Australian food standard for gluten free.**

To label a food gluten free Internationally:-

The International food standards, followed by many countries, allow up to 20 ppm of gluten to be in a food labelled gluten free. The detail of the standards will vary slightly in each country.

Research has shown that 20ppm is acceptable for people with coeliac disease, so please be assured that you can travel overseas. A special type of oat is also called *gluten free* overseas and can be found in foods labelled gluten free there. Currently Australia is not allowing those **oats** to be called gluten free.

These other trademarks pictured, can be found on gluten free food around the world. They fulfil the gluten free requirements in their own country, where they could contain up to 20ppm of gluten. However many of the larger international companies have no detectable gluten in their products that are distributed world-wide. Only products with no detectable gluten can be sold in Australia if they are labelled gluten free.

If you see that USA symbol in Australia or New Zealand it will have <3ppm. Anywhere else in the world it can contain up to 10ppm of gluten.



Australia



Europe



CUK-G-001

USA



[means <10ppm
anywhere in the world]

New Zealand
& Europe



CERT TM

Canada



Reading a Food Label: 5 steps

Keeping all that you have learned about gluten free food labelling, below are 5 steps you can take to competently read a food label for gluten.

5 STEPS TO READING A FOOD LABEL FOR GLUTEN

1. Look for a Registered Trademark to show the product is gluten free.
 - *If present, you can purchase the product.*
2. Is the product labelled gluten free?
 - *If so, you can purchase the product.*
3. If not labelled GF— Does the CONTAINS ALLERGEN STATEMENT include wheat or gluten.
 - *Avoid if gluten is declared.*
4. If just wheat is declared, with PEAL labelling this is safe. But to double-check, use the Coeliac Australia label reading App to see if the wheat ingredient contains detectable gluten or not.
 - *Avoid if the ingredient contains detectable gluten X*
 - *Include if there is no detectable gluten in any of the ingredients*
 - *due to current inconsistencies on the labelling, this step is worth doing*
5. Look at the MAY CONTAIN STATEMENT if it is gluten free by ingredient. This is a voluntary warning that cross contact of the product with gluten is possible.
 - *Individual responses are possible here if BROWN ingredients or gluten are declared.*

Here is a practice product for you.

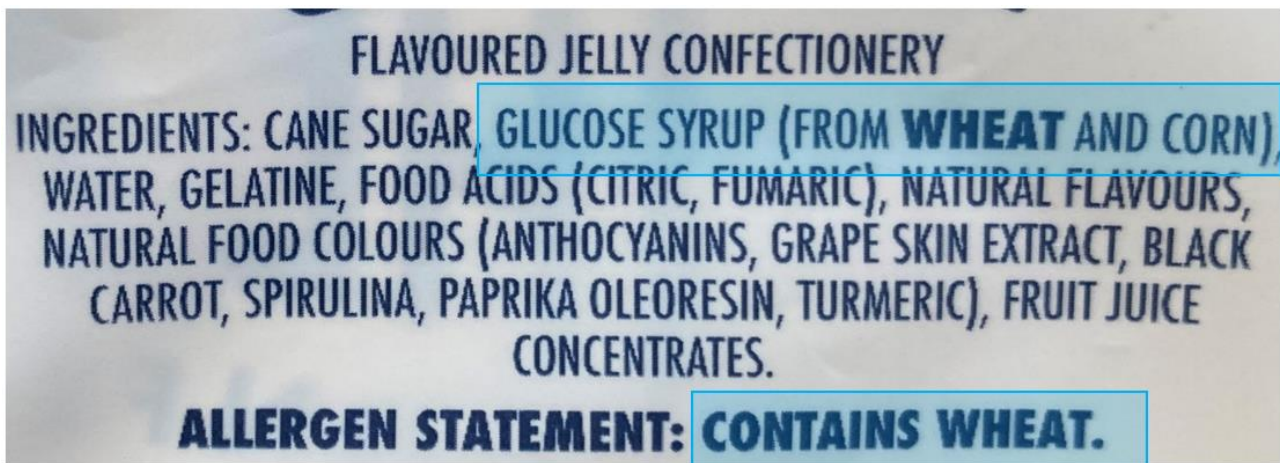
1. Is there a Gluten Free Trademark?

NO

2. Is the product labelled gluten free?

NO





3. Is there a Contains/Allergy Statement?

YES there is
 There is no gluten declared.....therefore the product can be eaten under a PEAL label

4. To double check if only wheat is declared (it may be an old label)

Scan the ingredients to see which ingredient contains wheat.

The product tells us that sometimes the glucose syrup is from wheat and sometimes it is from corn. (The manufacturer buys the cheapest one available at the time, so this is changeable).

- Glucose syrup will always be gluten free from corn.
- Look up Coeliac Australia app to see that glucose syrup from wheat is so refined that it contains no detectable gluten.

✓ Glucose syrup

The only wheat derived ingredient has no detectable gluten, suggesting the product is safe to eat.

Glucose syrup (wheat)

5. Is there a May Contain Statement for a BROW ingredient or gluten?

NO there is no May Contain Statement on the product.
 There is no gluten declared.....therefore the product can be eaten

LABEL EXAMPLES

Ingredients: wheat flour, Khorasan flour (**wheat**), milk, vinegar, malt extract (**barley**), Thickener 1442, colour 160b, salt

Contains: wheat, gluten, milk

May Contain: egg and peanut

This is a standard gluten-containing label. Khorasan is identified as being a wheat flour. Wheat and Khorasan flours are both wheat and gluten. Barley malt extract contains gluten. The *Contains statement* will therefore list both words— wheat, gluten

The product is NOT SUITABLE

Package labelled gluten free

Ingredient List: rice flour, tapioca starch, quinoa flour (10%), **soy** flour, water, iodised salt

Contains: **soy**

May Contain: **milk, egg**

This shows a straightforward gluten free product. No gluten or wheat listed in the *CONTAINS statement*.

The product is **SUITABLE**

Package labelled Gluten Free

Ingredient List: hydrolysed vegetable protein* (**wheat, soy**), water, naturally brewed **soy** sauce [soya bean, maize, caramel colour (**wheat**), salt]

Contains: **wheat, soy**

May Contain: **sulphites**

Wheat declaration alerts wheat allergic people. Because the manufacturer has labelled the product gluten free— this means that any wheat derived ingredient used in this product no longer contains any detectable gluten . This is why 'gluten' was not declared in the *Contains statement* under PEAL and it can be labelled gluten free.

The product is **SUITABLE**

Ingredient List: Cornmeal, starch, **barley** malt extract, sugar, salt, maltodextrin, vitamins (folate, thiamine), minerals (iron, zinc)

Contains: **gluten**

May Contain: **milk, peanuts, cashew**

The source of starch & maltodextrin is not declared so they are gluten free. Barley will be identified as gluten in the *Contains statement*.

The product is **NOT SUITABLE**

Package labelled Wheat Free Oats

Ingredient List: wheat free **oats**

Contains: **gluten**

Because OATS cannot be called gluten free in Australia, the presence of them on a food label, under current FSANZ PEAL legislation, will mean gluten will be declared in the contains statement.

However, if the manufacturer has labelled the product wheat free oats, (pure or uncontaminated) AND there is no May Contain statement for any cross contact with wheat, rye or barley grains — **these are the oats suitable in Australia for those with coeliac disease to eat.** NB: The *Ingredient list* should also say wheat free oats (or pure or uncontaminated oats).

Ingredient List: corn (90%), sugar, salt, rice malt, vitamins (vitamin E, niacin, folate), minerals (iron, zinc oxide)

May Contain: **wheat, milk and peanuts**

There are NO allergens as actual ingredients in this product. Therefore none of the ingredients are bolded and a *CONTAINS statement* is not needed.

The **MAY CONTAIN statement** tells us that it's possible that the product was exposed to wheat cross contact. Therefore gluten may be possible. **There is no PEAL legislation for the May Contain statement:- so gluten is not legislated to be listed here.**

Responses here are variable. Some people choose to always avoid such declarations and there may be times others choose to eat it.

Personal choice

**Please note that sometimes gluten can still be detected in hydrolysed wheat protein. It will vary with the process used. So this ingredient will not always be listed as gluten free.....as shown in this example.*

References:

- Food Standards Australia New Zealand: -
https://www.foodstandards.gov.au/consumer/labelling/Pages/allerg_en-labelling.aspx
1. Zurzolo GA, et al. *Clin Exp Allergy*. 2017;47:961–968.
 2. Ford LS et al. *FJ. Allergy Clin. Immunol*. 2010; 126: 384–5.
 3. Hardy MY, et al. *J Autoimmunity*. 2015 Jan;56:56-65

