

CODEX Considerations

When is 'no gluten' too much gluten?

By Dr John Wyeth

There is plenty of evidence from medical research to confirm that consuming foods containing less than 20 ppm of gluten is safe and appropriate for the vast majority of people with coeliac disease requiring a gluten free diet (GFD). Around the world, people with coeliac disease are eating foods labelled 'gluten free' according to the CODEX standard and they are healthy.

A very small number of people may react to even the tiniest trace of gluten. It is important that such people still have the choice to access products that contain 'no detectable' gluten. Within the proposed changes, there will remain access to such products, ensuring that individuals have choice about their food selections. Any individual with coeliac disease who has specific concerns about this should discuss their specific situation with their gastroenterologist.

At present, long-term maintenance to a GFD remains one of the key aspects of the long-term management of coeliac disease. Poor compliance to GFD (with regular consumption of gluten-containing foods) is the most common cause of poor outcomes. Access to gluten free foods, along with good dietetic support and education are important. Furthermore, appropriate follow-up to ensure healing is another critical part of overall management.

If the current, no detectable gluten standard is maintained (i.e. less than the detectable limit of 3 ppm) there will likely be significant costs and consequences. Food manufacturers and producers will have more costs in producing food to the standard, and this extra cost is only going to be passed directly on to you, the consumer. Another consequence would be reduced food choice. It is well accepted that a wide variety of foods are needed for a healthy diet. With overly strict requirements for gluten free foods, choice is going to be limited in your diet.

When is 'no gluten' too much gluten? If we continue with the present FSANZ regulations, this question will have an ever changing answer. A definite level, as stated in the internationally accepted CODEX is required.

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What does parts per million mean?

The term parts per million (ppm) is used to express the threshold for GFD in the accompanying articles. What does this actually mean?

PPM is a very tiny unit of measure that indicates 20 units of the item of interest in a total of 1 million units overall. In regards gluten, "20 ppm" means that there would be 20 mg of gluten in 1,000,000 mg of food.

To provide some perspective, a slice of standard wheat bread contains approximately 4 grams of gluten. At a level of 20 ppm, 4 grams of gluten would be contained in 200 kg of food. Alternatively: a few crumbs of bread contain 10 mg of gluten - the same amount of gluten would be found in half a kilogram of food at 20ppm.

Note 1 kilogram (kg) equals 1,000,000 milligrams (mg)

Twenty is OK

By Professor Andrew Day

The Australian Food and Grocery Council (AFGC) is in the process of making a submission to the Food Standards Australia and New Zealand (FSANZ) for a change to the definition of 'gluten free'. Given that there have been concerns raised about the proposal; it is now timely to clearly present the background and key aspects of this issue.

The current definition of 'gluten free' in Australia and New Zealand

Currently, a manufactured product that carries a gluten free claim in New Zealand must not contain any 'detectable gluten' (i.e. 'zero' gluten) based on laboratory tests. This standard was introduced around the turn of the century. At that time testing methods were able to detect gluten at levels of 30 parts per million (ppm) and above. Prior to that, the gluten free standard was set at 200 ppm in many countries, including Europe and Australia.

Current detection techniques are able to detect levels of gluten down to 3ppm. However, techniques are becoming more enhanced and it is conceivable that the threshold of detection will soon be even less than this (i.e. down to parts per billion).

What is AFGC proposing?

The AFGC is proposing that a product containing less than 20ppm of gluten should be defined as gluten free. In addition, there would be an expectation that the precise amount of gluten present would be listed in the Nutrition Information Panel (NIP) contained on any manufactured product. For instance, a good containing a measured 10 ppm of gluten would be termed gluten free, and 10ppm would be then detailed in the NIP. On the other hand, a food with less than 3ppm (below the current limit of detection) would also be called gluten free but the NIP would detail that there was no detectable gluten.

What is the international perspective on this proposed change?

The Codex Alimentarius (CODEX) provides an international standard for foods. The Codex is administered by the World Health Organisation (WHO) and the Food and Agriculture Organisation of the United Nations (FAO). Since 2008, the Codex has defined gluten free foods as containing not greater than 20ppm of gluten.

Consequently, over the last 5 years, the Australian standards have not reflected this international standard. The proposed change to the definition of gluten free will bring us into line with the Codex.

Gluten free diet for coeliac disease

Treatment of coeliac disease needs to achieve optimal health in as many patients as possible. At present the best management for coeliac disease involves a life-long gluten free diet (GFD). The GFD is a complex treatment, and strict exclusion of dietary gluten is challenging. Not all people diagnosed with coeliac disease achieve small bowel healing on a GFD in a timely manner, and many patients remain sub-optimally compliant with the GFD. To succeed as a treatment the GFD needs to be as achievable as possible and satisfactory access to affordable GF foods is a key component.

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