



# FRANK MASSONG

VP Regulatory & Technical Services  
Allergen Control Group Inc.

THE 2016 GLUTEN-FREE STAKEHOLDER UPDATE & PLANNING SESSION PRESENTED IN COOPERATION WITH:



Agriculture and  
Agri-Food Canada



Canadian Grain  
Commission

Growing Forward 2 



Pulse Canada 

# SUMMARY OF FINDINGS AND RESULTING ACTIONS FROM MARCH 2013

Frank Massong,  
VP Regulatory and Technical Services  
Allergen Control Group  
September 27 2016



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# SUMMARY OF FINDINGS AND RESULTING ACTIONS FROM MARCH 2013

## What Happened:

- forum for gluten-free stakeholders from the government, industry (e.g. producers, manufacturing, packaging, retail and celiac and gluten sensitive consumers as well as food safety consultants, certification bodies and testing laboratories.
- Shared lessons learned and discuss what it would take to advance the production and marketing of credible and affordable gluten-free food products.
- A consensus of these stakeholders was reached on gaps, areas of future work and prioritization which was reported back to all.

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# SUMMARY OF FINDINGS AND RESULTING ACTIONS FROM MARCH 2013

## Consensus on Priorities of Action:

- **Activity 1- Grow the Supplier Base of Certified Gluten-Free Products**
- **Activity 2- Sampling and Testing Protocols for Gluten-free Certification**
- **Activity 3- Communication Between Canadian Stakeholders in the Gluten-free Market**
- **Activity 4- Keep developing and advancing the Gluten-Free Certification Program**

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# CRITICAL REGULATORY AND POLICY EVENTS

## In Canada:

- new food allergen labelling regulations came into force on August 4, 2012 for allergens, gluten and sulphites
  - Made undeclared gluten to mean free from like allergens and sulphites
  - Retained Division 24 FDR - Foods for Special Dietary Use
- new labelling proposal to allow “gluten-free” claims for specially produced oats
  - Market Authorization issued May 2015 to allow gluten-free oats but not oats generally

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# CRITICAL REGULATORY AND POLICY EVENTS

## In USA:

- **USFDA rule on gluten-free claims came into effect in August 2013**
  - < 20 ppm for gluten from grains like wheat, rye and barley
  - Unconditional use of oats
  - Ambiguous for intentional addition of gluten (allow dilution?)
- **USDA and Alcohol and Tobacco Tax and Trade Bureau (TTB) adapting and intend to follow USFDA in the future**

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# CRITICAL REGULATORY AND POLICY EVENTS

## In the World:

- EU - “gluten free” and “very low gluten” labelling of less than 20 ppm and no more than 100 ppm respectively retained in July 2016
- Australia/NZ – “gluten-free” threshold <3-5 ppm and gluten-free oats allowed
  - “low gluten” threshold no more than 200 ppm
  - Handled like a foods for special dietary use
- Other countries- more or less follows CODEX for < 20 ppm for gluten

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# OTHER EVENTS OF NOTE:

- **New developments in testing methods have occurred**
  - **lack of knowledge/consensus of:**
    - **the best application of most current as well as older tests**
    - **testing protocols, their limitations and benefits in supporting management systems.**
- **Consumer demand greatly exceeds the supply of credible gluten-free inputs and products especially gluten-free oats**
- **GFSI benchmarked food safety standards and audit protocols have not adapted to adequately address undeclared gluten as a food safety hazard or even consider a gluten-free certification**

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# APPLICATION MADE TO AAFC BY CCA

- Growing Forward 2 was launched in April 2013 ends March 2018
- Assurance Systems Stream: helps enhance the competitiveness of the agriculture industry by meeting buyer and market demands for assurance. The stream supports developing national assurance systems or standards
  - Required 25% contribution by the applicant and supporters
    - (15% cash)
- **SUCCESS \$\$\$**
  - \$515,750 from AAFC and \$170,000 from other sources

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# AAFC/CCA PROJECT

## Enhancing Access to Sources of certified Gluten-Free Grains, Testing Protocols and Communication between Stakeholders

- **Activity 1- Grow the Supplier Base of Certified Gluten-Free Products**
- **Activity 2- Sampling and Testing Protocols for Gluten-free Certification**
- **Activity 3- Communication Between Canadian Stakeholders in the Gluten-free Market**

**Left out - Activity 4- Keep developing and advancing the Gluten-Free Certification Program to be resourced by Allergen Control Group and left out of the application**

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# ACTIVITY 1- GROW THE SUPPLIER BASE OF CERTIFIED GLUTEN-FREE PRODUCTS

- A core addendum to be developed and ready for use by the grain sector for gluten-free certification
- Endorsed by the Pulse Canada and the Prairie Oat Growers Association
- CCA Partnered with Canadian Grain Commission

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# ACTIVITY 2- SAMPLING AND TESTING PROTOCOLS FOR GLUTEN-FREE CERTIFICATION

- Reviewing available analytical techniques for the detection and quantification of gluten in a variety of food stuffs
- Determining product categories and their inherent risk of gluten contamination.
- Assessing appropriate sampling plans and procedures per product categories
  - Recommending guidance on sampling plans
  - Determining optimal testing methodologies
- Drafting best practices for sampling procedures and frequency as well as testing methodologies for verification and validation purposes to support gluten free management systems.
- Pilot the best practices guidance materials after training

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# ACTIVITY 3- COMMUNICATION BETWEEN CANADIAN STAKEHOLDERS IN THE GLUTEN-FREE MARKET

- **Develop and deliver of a 2 day, facilitated gluten-free stakeholders session with the purpose of sharing insights into topics such as the gluten-free market and certification processes and then to create a prioritized strategic plan for advancing the market.**
- **The stakeholders to include retailers, producers, manufacturers, government regulators, consultants, certification bodies and others in a facilitated forum.**
- **Report findings**

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