

## The Controversy of Oats in a Gluten-free Diet

Now, there is probably no greater controversy within the celiac community and the gluten-free food chain than the risk of gluten in oats and the requirements for “gluten-free oats” in gluten-free foods.

Gluten refers to proteins found in wheat, barley, rye and any hybridized strain created from at least one of those cereals. So what is the controversy around oats? Oats are considered a high-risk ingredient in gluten-free products because of almost universal contamination between barley and oats in the growing fields and the additional risk of contamination during harvest and processing. The mechanical separation of these cross-contaminated grains is also difficult since the barley, oat and wheat seeds are so similar in size.

Despite this, the U.S. Food and Drug Administration (FDA) rule on gluten-free claims still excludes oats from the definition of “gluten” and does not mandate any other preventative measures for a finished food product other than it must contain less than 20 ppm of gluten, to bear a gluten-free label. Health Canada, on the other hand, prohibits the addition of regular commodity oats in all gluten-free products sold in Canada. However, it will allow “gluten-free oats” providing there is sufficient evidence, that they have been subjected to special processes to ensure they are safe and that the final product does not contain more than 20 ppm of gluten.

To protect North American consumers from the inadvertent contamination of gluten via oats, the Gluten-Free Certification Program (GFCP) has also adopted the Canadian gluten-free regulatory requirements as a basis for recognizing and sanctioning the best practices, which manufacturers need to implement and validate to achieve <20 ppm of gluten in a final product.

The GFCP requires that all incoming ingredients entering a manufacturing facility with a gluten-free management system in place be verifiably gluten-free. This means that all

incoming oats must show proof that they are “gluten-free oats.” As oats are considered a high-risk gluten contaminant, facilities should clearly set their specifications such that “gluten-free oats” have been grown, transported, stored, prepared and managed in a manner that avoids cross-contamination by wheat, barley, rye or their hybridized strains, to consistently achieve the desired food safety outcome of <20 ppm for gluten.

Suppliers of “gluten-free oats” should have documented standard operating procedures (SOPs) in place, which can be assessed by the facility to verify that the supplier conforms to those specifications. SOPs should include but not be limited to seed purity, field management, the cleaning of harvesting equipment, storage management and transportation.

The GFCP fully supports the appropriately named “purity protocol” as the gold standard and only evidenced-based approach to minimize risk. When it comes to producing “gluten-free oats,” industry questions whether this is the only acceptable process to reduce the risk of product failure, or are there other interventions which may augment variations of the protocols, such as the application of strategic optical or mechanical screening and testing, that are also effective. These approaches start with a higher risk profile so the challenges are in gaining assurance with a higher risk product through additional sampling and testing.

The purity protocol specifies how oats can be grown and handled to prevent any cross-contact with gluten-containing grains. This includes dedicated growers, dedicated storage facilities, and controlled transportation, including a trace-back and verification process back to the grower. The prevention approach requires additional diligence, however, and has been proven to produce a higher level of safety in gluten-free oats.

The GFCP recognizes intervention on-farm as an efficient and effective way to “start clean” for the appropriate management of gluten during

manufacturing to “stay clean.” Sourcing “gluten-free oats” from a supplier who can demonstrate a “purity protocol” has reduced risk advantages, as documented due diligence at the supplier level can be plugged directly into a gluten-free management system as evidence, at the manufacturing level. Less due diligence at the supplier level results in a greater risk and thus burden on the manufacturer to provide proof of conformity (i.e. visual inspection, testing, rejection of the ingredient or finished products before release to the public, etc.)

Regardless, any manufacturer using “gluten-free oats” under the GFCP is subjected to a rigorous risk evaluation of their gluten management system to demonstrate that ability to manage incoming “gluten-free oats” consistently meets <20 ppm of gluten food as the standard for a safety outcome.

One thing is certain, how to consistently achieve “gluten-free oats” has forced industry, governments and consumer groups to investigate closer. The GFCP accomplishes this strictly on an individual “case by case” basis, using science to seek out the facts and provide documented proof to ensure that the requirements of both the GFCP and the regulators are met.



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