Guide to the GDSN attributes for gluten-free products suitable for coeliacs

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Summary

Introduction

This document is intended to provide a guideline for the compilation of the GS1 GDSN attributes related to food products suitable for coeliac consumers.

1   Characterization of food for coeliacs

For many years, the Ministry of Health has managed a National Register of foods specifically formulated for coeliacs and the products that can be supplied by the National Health Service are subject to a notification procedure that assesses their compliance with current legislation in order to guarantee product safety and correct information to consumers.

The Ministry of Health allows companies to put a reference to this inclusion in the Register on the outer package of the products that are included in the National Register, in the same visual field of the Name. This consists of a logo provided by the Ministry whose affixing is optional. That means that not all products in the National Register report it.

Furthermore, since 2016, the products included in the National Register must use the accessory terms "specifically formulated for coeliacs" or "specifically formulated for people intolerant to gluten".

These information and any further information can be found on the website of the Italian Coeliac Association (*www.celiachia.it*) as well as on the website of the Ministry of Health (*http://www.salute.gov.it/portale/temi/p2_6.jsp?lingua=italiano&id=3667&area=Alimenti%20particolari%20e%20integratori&menu=registri*).

With regard to this type of product, it is therefore necessary to distinguish the information between "Gluten Free" and "Refundable": "Refundable" means that this product is included in the Italian National Register of products that can be paid by the SSN (the Italian national health system), while "Gluten Free" identifies any product with the claim "gluten-free", not necessarily certified.

Unfortunately this Register, at least for now, is provided by the Ministry of Health only in the form of a list by product or by company and as a PDF file.

The products are listed only by name and are not identified through the GTIN, so it's difficult to consult and manage and for this reason the manufacturer is asked to fill in this information in the GDSN Data Model.

The compilation of these specific attributes is required only at the consumer unit level.

1.1   Gluten-Free Products

Non-certified Gluten Free products are those that report a claim on the label about the absence of gluten, therefore "free of gluten".

The attributes of interest, belonging to the module productInformationModule, are those shown in the table below.

Different code values of attribute "claimTypeCode" can be used to indicate, according to Regulation (EU) No 828/2014:

- *Gluten-free* products: claimTypeCode = FREE_FROM; claimElementCode = GLUTEN;
- *Very-low gluten* products: claimTypeCode = VERY_LOW; claimElementCode = GLUTEN.

Through the attribute "claimDescription" it is possible to specify a statement, as indicated in Regulation (EU) No 828/2014, among:

- *Suitable for people intolerant to gluten/coeliacs* products: claimDescription = "Suitable for people intolerant to gluten"/"Suitable for coeliacs";
- *Specifically formulated for people intolerant to gluten/coeliacs* products: claimDescription = "Specifically formulated for people intolerant to gluten"/"Specifically formulated for coeliacs".

BMS ID	Attribute	Module	Technical Attribute Name	Definition (ADB)	Attribute value
7237	Claim Type Code	ProductInformation Module	claimTypeCode	The code that states the type of claim relevant to the Element Claim Code.	**FREE_FROM/ VERY_LOW**
7233	Claim Element Code	ProductInformation Module	claimElementCode	The code used to reference a specific element claim about the product.	**GLUTEN**
7235	Claim Marked On Package	ProductInformation Module	claimMarkedOnPackage	n.d. (GDD) Is the claim specified by Nutritional Claim Type Code in combination with Nutritional Claim Nutrient Element Code labelled on the product package.	**TRUE**
7239	Claim Description	ProductInformation Module	claimDescription	The information provided by the seller about the product's nutritional/health claims. (free text)	"Suitable for people intolerant to gluten"/"Suitable for coeliacs"/"Specifically formulated for people intolerant to gluten"/"Specifically formulated for coeliacs"

1.2   Certified Gluten-Free Products

Certified Gluten-Free Products are those products on which the "Crossed Grain Ear" symbol is present.

The Crossed Grain Ear is a registered symbol and owned by the Italian Coeliac Association (AIC).

The symbol can be affixed to those products for which the suitability for consumption by coeliacs has been ascertained (gluten content less than 20 ppm) and therefore it indicates only the products whose production process has been examined and certified.

The GDSN attribute to be used to indicate this logo is the following one.

BMS ID	Attribute	Module	Technical Attribute Name	Definition (ADB)	Attribute value
2312	Third Party Accreditation Symbol on Product Package Code	packagingMarking Module	PackagingMarkedLabel AccreditationCode	The code representing a symbol or marking third party accreditation on the product package.	**(CROSSED_GRAIN _SYMBOL)** – CROSSED GRAINnSymbol (for Coeliacs – Gluten Free food)

The symbol "Crossed Grain Ear" is shown as an example in the pictures below:

1.3   Refundable Gluten-Free Products

Refundable Gluten-Free Products are those products included in the National Register provided and updated by the Ministry of Health, refundable to the coeliac consumer through the SSN (the Italian national health system).

These products could optionally carry the logo "Gluten-Free Food – Product to be supplied" on the packaging, at the discretion of the manufacturer, as illustrated below:

As for this case study, the attributes that need to be compiled are the following ones.

BMS ID	Attribute	Module	Technical Attribute Name	Definition (ADB)	Attribute value
1066	Dietary Regime Code	dietInformation Module	dietTypeCode	The code indicating the diet the product is suitable for.	**COELIAC**
1069	Certification Agency	dietInformation Module	certificationAgency	n.d. (GDD) Name of the organization issuing the certification standard or other requirement being met. Free text field. Example: European Union (free text)	**Ministero della Salute**
1089	Certification Value	dietInformation Module	certificationValue	The unique identification (ID) that provides a trade item's certification standard value, official licensing number or identification which proves that a product/process has passed the certification procedure. (free text)	**RIMBORSO_ CELIACHIA**