

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

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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%20p%20articolari%20e%20integratori&menu=registri).

About this type of products, it's therefore necessary to distinguish the information between “Gluten Free” and “Refundable”: “Refundable” means that this product is included in the National Register of products that can be paid by the NHS.

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 only report a reference on the label about the absence of allergens, therefore “free of”. The attributes of interest are:

- The Allergen Specification Agency, or the agency that controls the definition of the allergen, in the example shown the European Union;
- The Allergen Specification Name, that is the name and the version of the regulation containing the definition of the allergen;
- The Allergen Type Code, indicating the allergen according to a standardized code list, for example “AW” indicates “Cereals containing gluten”;
- The Level of Containment Code, or the code indicating the level of presence of the allergen in the product, in the example “Free_from”;
- The “Free from” Code, which on the packaging gives an indication of the food ingredients marked as “not present inside the package”: for example in the case of gluten-free products, “FREE_FROM_GLUTEN”.

Attribute	Module	Description	Example
Allergen Specification Agency	allergenInformationModule	The agency that controls the definition of the allergen	EU
Allergen Specification Name	allergenInformationModule	Name and version of the regulation / standard that contains the definition of the allergen	1169/2011
Allergen Type Code	allergenInformationModule	Code indicating the type of allergen	AE
Level of Containment Code	allergenInformationModule	Code indicating the level of presence of the allergen	(FREE_FROM) – Free from – Product is free from the indicated substance
“Free of” Code marked on the package	healthWellnessPackagingMarkingModule	Indication of the food ingredients that are marked as not present inside	(FREE_FROM_GLUTEN) – Gluten-free

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:

- Packaging Marked Label Accreditation Code, or the symbol of the crossed grain ear “CROSSED_GRAIN_SYMBOL”.

Attribute	Module	Description	Example
Packaging Marked Label Accreditation Code	packagingMarkingModule	Mark indicating that the Trade Item has received an acknowledgment, a certification from the issuing agency, shown on the label. This doesn't represent a statement for regulatory purposes on products such as those marked with "Free from" on the package.	(CROSSED_GRAIN_SYMBOL) – CROSSED GRAIN Symbol (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 NHS. 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:

- “Certification Agency”, or the agency/organization that issues the certification, in the example the Ministry of Health;
- “Certification Value”, ie the standard certification value of the product.

Attribute	Module	Description	Example
Certification Agency	certificationInformationModule	Name of the organization that issues the certification standard/other requirement	Ministero della Salute
Certification Value	certificationInformationModule	Standard Product Certification Value	RIMBORSO_CELIACHIA