



Re: Blenders Malt Vinegar – Gluten Free

There are two separate pieces of legislation which deal with allergens and gluten-free claims:

Allergens – EU 1169/2011

Annex II:

1. Cereals containing gluten, namely: wheat (such as spelt and khorasan wheat), rye, barley, oats or their hybridised strains, and products thereof, except: ▼ B (a) wheat based glucose syrups including dextrose (1); (b) wheat based maltodextrins (1); (c) glucose syrups based on barley; (d) cereals used for making alcoholic distillates including ethyl alcohol of agricultural origin;

Malt vinegar is made from barley and therefore, the allergenic source of the material must be declared (even though the vinegar does not contain any allergenic material following double fermentation).

Gluten-Free Claims – EU 828/2014

Paragraph 9

“Ingredients naturally free of gluten to bear terms indicating either the absence (‘gluten-free’) or reduced presence (‘very low gluten’) of gluten”

The malt vinegar itself contains < 5 ppm so it is well below the threshold of 20ppm. Therefore, we are able to make a gluten-free claim.

So in summary, allergen legislation requires that we list (and bold) **‘Barley’** within the ingredient listing (even though the processing reduces the allergen to a negligible level.). Gluten-free legislation permits the making of a ‘gluten-free’ claim as <20 ppm of gluten.