

# INTERNATIONAL TECHNICAL CARAMEL ASSOCIATION

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## **International Technical Caramel Association (ITCA) Industry Position Statement on Gluten Free Caramel Color**

Two key factors that determine the gluten content of a product are the source of the ingredients and the processing used to manufacture the product. According to the U.S. Food and Drug Administration's (FDA) standard of identity for caramel, caramel color additives can be derived from a variety of food-grade carbohydrates including dextrose, invert sugar, lactose, malt syrup, molasses, sucrose, and starch hydrolysates and fractions thereof.<sup>1</sup> Caramel color produced from corn or cane-based materials would be unlikely to contain gluten due to the lack of gliadin in the carbohydrates. Conversely, using malt syrup from rye, barley, or other grains to produce caramel color may result in a product that contains gluten due to the presence of gliadin, the gluten protein, in the grain.

In North America, manufacturers typically use corn or sucrose in the production of caramel color, with corn starch hydrolysate being the most common ingredient. As a result, products from the North American caramel color industry are free of gluten. Most caramel color derived from wheat is also considered to be gluten free due to the highly refined processing of the glucose syrup which results in removal of the protein (gliadin). The European Commission, in Directive 1169/2011/EC Annex II,<sup>2</sup> exempts "wheat based glucose syrups including dextrose," and "products thereof," such as caramel color, from labeling as derivatives of cereals containing gluten in the European Union (EU).

For caramel color or a caramel color-containing product to be labeled "gluten free," the product must adhere to gluten labeling regulations. These vary globally. To be labeled gluten free in the U.S. and the EU, a product should either not contain a gluten-containing grain, or be processed to contain the lowest amount possible -- less than 20 parts per million (ppm) gluten.<sup>3</sup> Caramel color produced in other regions, however, may be derived from gluten-containing ingredients. To be labelled "gluten free" in Australia, a product must undergo independent testing to certify that it contains less than three ppm gluten. Shelley Case, a registered dietitian on the Medical Advisory Board of the Celiac Disease Foundation, the Gluten Intolerance Group, and the Canadian Celiac Association, has stated that the processing of caramel color results in a product that does not contain detectable gluten, making caramel color an acceptable ingredient on the gluten free diet.<sup>4</sup>

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<sup>1</sup> 21 C.F.R. § 73.85(a).

<sup>2</sup> See <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011R1169&from=EN>.

<sup>3</sup> 21 C.F.R. § 101.91; Implementing Regulation (EU) No 828/2014, available at <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32014R0828&from=EN>.

<sup>4</sup> VeryWell, *Is Caramel Coloring Gluten Free?*, available at <https://www.verywell.com/is-caramel-coloring-gluten-free-562525>.