

Frequently Asked Questions about Alcohol on the Gluten-Free Diet

- Alcoholic beverages are either fermented or distilled. If an alcohol is **fermented**, it may contain protein from the starting materials that provided the starch or sugar. Whether a fermented alcohol is considered free of gluten protein depends upon the starting material.

Fermented Alcohols That <u>Are</u> Considered Gluten-Free ¹	Fermented Alcohols that are <u>Not</u> Considered Gluten-Free ¹
Wine	Beer and other malted beverages (ale, porter, stout) Sake/rice wine made with barley malt
True Hard Cider	Flavored hard cider containing malt
Labeled Gluten-Free beer (made without malted barley)	Flavored hard lemonade containing malt
	Flavored wine coolers containing malt or hydrolyzed wheat protein

- If the alcohol is a **distilled** product, proteins from the starting materials that provided the starch or sugar are removed.
 - Distilled spirits are considered to be free of gluten protein even if the starting material for the alcohol is wheat, barley, or rye.**
 - Distilled alcohols include:
 - Pure distilled spirits such as vodka, gin, whisky, brandy, rum, and tequila
 - Flavored spirits, such as flavored vodka and flavored gin (These spirits are considered gluten-free UNLESS a gluten-containing ingredient has been added in after distillation.)
 - Liqueurs and cordials

Q: Who regulates alcohol in the U.S.?

- Most alcohol is regulated by the TTB. The TTB regulates malt beverages.
- The FDA regulates beer that is NOT made with both barley and hops. A good example is labeled gluten-free beer. Gluten-free beers are made using a substitute for malted barley, such as sorghum malt.²
- The FDA regulates both wine and hard cider that contain less than 7% alcohol by volume.²

Q: Can alcohol regulated by the FDA be labeled gluten-free?

Alcohol regulated by the FDA must comply with the Food Allergen Labeling and Consumer Protection Act. Alcohol regulated by the FDA can be labeled gluten-free as long as it complies with the gluten-free labeling rule.

Q: What about labeling of alcohol that is regulated by the TTB? Is that different?

- Allergen labeling for alcohol regulated by the TTB is voluntary. ²
- In 2014, the TTB released an Interim Policy allowing gluten-free claims on product labels if the alcohol is made WITHOUT wheat, barley, rye, or crossbred varieties of these grains OR ingredients derived from these grains (examples: wine fermented from grapes and vodka distilled from corn).³
 - BUT producers must ensure that their raw ingredients and finished products (among other things) are NOT cross-contaminated with gluten.
 - The TTB will NOT allow gluten-free claims on product labels if the alcohol is made with wheat, barley, rye, or crossbred varieties of these grains OR any ingredients derived from these grains.
 - This means that distilled alcohol that has wheat, barley, or rye as a starting material can NOT be labeled gluten-free. This can be confusing to consumers. Regardless of this statement, pure distilled alcohol is considered to be free of gluten protein by consensus of celiac disease experts.

Q: I've heard recently about beer that has been treated to remove gluten, and gluten-reduced beers. Are they safe for me to drink? ⁴

- Gluten-reduced beers made with barley malt may NOT be labeled gluten-free. Gluten reduced beers should be avoided by those following a gluten-free diet.
- The TTB will allow this statement on product labels and in advertising: "Processed (or treated or crafted) to remove gluten" for products made with wheat, barley, rye, or crossbred varieties of these grains OR any ingredients derived from these grains IF these grains or ingredients have been processed (or treated or crafted) to remove all or some of the gluten.
- Fermented products (e.g., beer) must also include the following statement, "Product fermented from grains containing gluten and processed to remove gluten. The gluten content of this product cannot be verified, and this product may contain gluten."
- Due to testing issues, it is not known whether gluten-removed beers are safe to drink. Until more is known, they should be avoided.

Q: I live in Oregon and saw a gluten-removed beer (made from barley) that was labeled gluten-free. I thought that wasn't allowed? ⁵

- Sometimes there are differences in labeling of malt beverages from state to state. "The Federal Alcohol Administration Act (FAA Act) generally requires a prior certificate of label approval before beverages under its jurisdiction can be sold across state lines. IF a product is brewed and sold in the same state, this Act may not apply. For malt beverages this Act also may not apply if the laws of the state to which the beverage is being shipped do not require a prior certificate of labeling approval from the TTB. So... this is why, if you live in Oregon, you may come across a particular brand of beer made from barley malt that is labeled gluten-free." Per the TTB, "Under the FAA Act, States have the authority not to require Federal approval regarding the labeling of malt beverages that are sold within that State."

Q: If distilled products are made from wheat, barley, or rye, how can they be considered gluten-free?

- In 2015, the FDA stated in their proposed rule for fermented and hydrolyzed foods that "in most cases, it is unlikely that gluten will be present in a distilled food because distillation is a purification process that separates volatile components like alcohol and flavors from nonvolatile materials like proteins and sugars."⁶
- Distilled products made from wheat, barley, or rye must also include the following statement, "This product was distilled from grains containing gluten, which removed some or all of the gluten. The gluten content of this product cannot be verified, and this product may contain gluten."⁴
- **Regardless of this statement, pure distilled alcohol is considered to be free of gluten protein by consensus of celiac disease experts.**

AREAS FOR FUTURE RESEARCH

Some gluten-free beers and gluten-free ciders can be made using yeast that has been grown on gluten-containing growth media (wheat, barley, malt, and rye). Gluten-Free Watchdog is concerned that gluten containing growth media may lead to residual gluten in the final product. More research needs to be done on this topic.⁷

Q: What should I look for when I'm buying gluten-free beer or hard cider?

Gluten Free Watchdog recommends the following:⁷

- "Drink only those hard ciders and beers labeled gluten-free. At this time avoid products labeled "gluten removed".
- If you are concerned about growth media for yeast, contact the brewer and ask if the medium used to grow yeast is free of wheat, barley, malt, and rye.
- If the growth medium contains wheat, barley, malt or rye, ask if the yeast is tested for residual gluten using the competitive R5 ELISA. A sandwich ELISA will not adequately detect gluten protein fragments that may be found in fermented products, such as beer and cider.
- Regardless of testing, it may be prudent at this time to avoid products containing yeast grown on gluten-containing media.
- If a brewer is unwilling to provide information on yeast it may be best to avoid the product."

Resources for You:

Distillation Process

<http://www.glutenfreedietitian.com/newsletter/allergen-labeling-of-alcoholic-beverages/>

Yeast grown in a slurry containing malted barley contained gluten protein fragments detectable using the competitive R5 ELISA.

<https://www.glutenfreewatchdog.org/product/white-labs-pilsner-lager-yeast-not-labeled-gf/574>

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