

PINK TEAPOT BEAUTY CO.

ALLERGEN STATEMENT

The following is an excerpt from the Government of Canada's **Allergen-free, gluten-free and cross-contamination statements**:

“A gluten-free claim is any representation in labelling or advertising that states, suggests or implies that a food is free of gluten. In order for a food to be represented as "gluten-free", it must comply with section B.24.018 of the Food and Drug Regulations (FDR). Claims to the effect that a food does not contain an ingredient or substance must be factual and not misleading.

Section B.24.018 of the FDR prohibits the labelling, packaging, advertising or sale of a food in a manner likely to create an impression that it is a gluten-free food if the food contains any gluten protein or modified gluten protein, including any gluten protein fraction, from wheat, oats, barley, rye, triticale or their hybridized strains.

Although Health Canada's regulatory requirements for "gluten-free" foods do not refer to any specific threshold for gluten in products represented as "gluten-free", Health Canada considers that levels of gluten protein below 20 ppm generally do not represent health risks to consumers with celiac disease. The Canadian Food Inspection Agency (CFIA) has published a position on the Compliance and enforcement of gluten-free claims that reflects the Health Canada position, and takes into account whether gluten is present due to intentional addition or to cross-contamination.

General "allergen-free" or "no allergens" claims

General claims stating only "allergen-free" or "no allergens" are considered to be too broad in nature and are therefore not acceptable. The list of potential food allergen sources is not restricted to the list of priority food allergens identified by Health Canada. There are over 200 food proteins that can cause adverse reactions to some segments of the population. Therefore, it is likely to create an erroneous impression to state that a product is free of allergens.

"(Naming the food allergen source)-free" symbols

Any representation (statement, image or advertising) that states, suggests or implies that a food allergen source is not present when it is present would be considered false and misleading information under subsections 5(1) of the Food and Drugs Act and 6(1) of the Safe Food for Canadians Act. (Naming the food allergen source)-free symbols or representations are interpreted to be the same as making a "(naming the food allergen source)-free" claim. Therefore, the same requirements apply when using such symbols or images.

It is important that such symbols or images indicate what is absent in the product. It is recommended that clarifying text, such as a "(naming the food allergen)-free" statement, accompany the symbol to ensure the symbol or image is not misinterpreted.

"Does not contain nuts" claims on products containing coconut

Products containing coconut can declare "does not contain tree nuts or peanuts". Coconut must be declared in the list of ingredients as per general labelling requirements."

Pink Teapot Beauty Co. (PTBC) states that all products comply with the regulations outlined in section B.24.018 of the Food and Drug Regulations (FDR). PTBC also states that although these regulations are specifically in place for food items, PTBC recognizes that customers with Celiac Disease need to avoid gluten in all forms.

All products are manufactured in a gluten-free facility, and do not contain gluten. Other common allergens, including but not limited to, soy, tree nuts, coconut, and goat's milk, may be present in some products. All potential allergens are listed on the specific product's label.

Given these ingredients are present in the facility, there is potential for cross-contamination in products that do not directly contain these ingredients.

- Pink Teapot Beauty Co., September 2024