

CONSULTATION DRAFT

Enclosure No:	XX/XXXXXX/XXXX
Agenda item No:	X.X – All Wales Guide to Prescribing Gluten-Free Products (2026 update)
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1.0 Action for AWPAG

Consultees are asked to consider and comment on the *All Wales Guide to Prescribing Gluten-Free Products (2026 update)* and the associated Equality and Health Assessment (EqHIA) form.

For comparison, the current version of the document can be found on the [AWTTC website](#).

2.0 Purpose

Gluten-free products are an essential part of the treatment of coeliac disease or dermatitis herpetiformis.

Gluten-free foods are made available by the NHS to patients diagnosed with coeliac disease or dermatitis herpetiformis in order to encourage patients to adhere to a gluten-free diet and to help prevent more complex health problems from developing.

Originally published in 2013 and last updated in 2018, this latest update to the document is intended to review the content and layout of the document to make sure it is still appropriate for use, and also to incorporate reference to the new card-based Gluten-Free Food Scheme (GFFS) that is now being rolled out across Wales.

This guide aims to support prescribers and healthcare professionals by providing guidance on:

- calculating monthly gluten-free food unit requirements for patients.
- the prescribing of ACBS-approved gluten-free foods, including guidance on the recommended gluten-free food types, quantities and units that can be prescribed.

The resource is pertinent to the following ambitions set in the [AWMSG Strategy for Wales: 2024–2029](#):

- Advice, resources and guidance reflect the priorities and needs of people and health and social care professionals in Wales.
- People in Wales take their medicines in a way that maximises their health outcomes.
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2.1 Process

- March 2026: Draft document considered by AWPAG
- April–May 2026: Draft shared with Welsh Dietetics Leaders Advisory Group and Inflammatory Bowel Disease Network
- June 2025: Feedback considered by AWPAG
- July–August 2026: Draft document out for consultation

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- *September 2026: Consultation comments and responses considered by AWPAG for sign-off*
- *November 2026: Document presented to AWMSG for endorsement*

2.2 Consultees

Consultees include, but are not limited to:

- Directors of Pharmacy
- Medical Directors
- Assistant Medical Directors
- Health Board Chief Executives
- Directors of Nursing
- Local Medical Committees
- Directors of Public Health
- General Practitioners Committee Wales
- Royal College of General Practitioners
- British Medical Association Cymru
- Llais Cymru
- Community Pharmacy Wales
- Public Health Wales
- Welsh Government
- NHS Wales Joint Commissioning Committee
- National Institute for Health and Care Excellence
- AWMSG members and deputies
- AWPAG members and deputies
- Wales Dietetic Leaders Advisory Group
- National Strategic Clinical Network for Inflammatory Bowel Disease

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1.0 Background

Gluten-free foods are an essential part of the treatment of coeliac disease or dermatitis herpetiformis.

Gluten-free foods are made available by the NHS to patients diagnosed with coeliac disease or dermatitis herpetiformis to encourage patients to adhere to a gluten-free diet and help prevent more complex health problems from developing.

2.0 Aims

This guide aims to support prescribers and healthcare professionals by providing guidance on:

- calculating monthly gluten-free food unit requirements for patients.
- the prescribing of ACBS-approved gluten-free foods, including the recommended gluten-free food types, quantities and units that can be prescribed.

3.0 Supply of gluten-free foods

3.1 Indications

Patients with a confirmed diagnosis of coeliac disease or dermatitis herpetiformis are eligible for the NHS supply of gluten-free foods. Please see [National Institute for Health and Care Excellence \(NICE\) Guideline 20](#) on coeliac disease for further information¹.

3.2 Access to gluten-free foods in Wales

Within Wales, patients who are eligible for the NHS supply of gluten free foods can obtain these foods through either:

- the Gluten-Free Food Scheme (GFFS)* **or**
- NHS prescribing of Advisory Committee on Borderline Substances (ACBS)-approved gluten-free foods.

4.0 Dietary education

All patients newly diagnosed with coeliac disease or dermatitis herpetiformis should be referred to a dietitian.

During the consultation, the dietitian will inform patients of the range of foods available in the retail sector, and advise them to subscribe to Coeliac UK to obtain the 'Food and Drink Guide' and 'Live Well Gluten Free' app. These resources list a wide range of foods that are suitable for a gluten-free diet. The dietitian will also provide education, where appropriate, on food preparation at home and healthy food choices.

* The GFFS is an alternative to gluten-free prescribing and provides eligible patients with a pre-paid debit card which enables them to purchase gluten-free foods from shops and online retailers, offsetting the additional purchase cost of gluten-free staple foods. Further information on the scheme including operational arrangements is available from local health boards.

The dietitian will discuss the two options available to the patient to obtain gluten-free foods (GFFS or NHS prescribing) and decisions about the most appropriate route of supply should be made through shared decision making with the patient, considering the individual's needs. The dietitian will inform the GP of the patient's choice.

The dietitian will provide the specific requirements for the prescription of gluten-free foods if NHS prescribing is the chosen option.

Local nutrition and dietetic service guidelines should be checked for guidance on referring patients with existing coeliac disease for a nutrition review.

5.0 Food units and monthly requirements

Patients receiving gluten-free food require calculation of their individual monthly requirement in 'units'.

5.1 Units of gluten-free foods

National Prescribing Guidelines for gluten-free food produced by Coeliac UK, and endorsed by Primary Care Society for Gastroenterology and the British Dietetic Association calculate units of gluten-free foods according to established average energy requirements for age and sex and draw on consumption data from the National Diet and Nutrition Surveys². It assumes that individuals will be getting additional carbohydrates from rice and potatoes alongside staple foods. Unit values for gluten-free food groups can be found in Table 1.

Table 1. Unit values for gluten-free food groups²

Food item	Weight	Units
Bread, rolls or baguettes	400 g	1
Bread mix/flour mix	500 g	2
Savoury biscuits or crackers	200 g	1
Pasta	250 g	1
Pizza bases	300 g	1
Breakfast cereals	300 g	1.5
Oats	500 g	1.5

5.2 Monthly gluten-free food unit requirements

Approximate monthly requirements for various patient groups can be found in Table 2².

Table 2. Approximate monthly gluten-free unit requirements by age and sex²

Age and sex	Units per month
Child 1–3 years	10
Child 4–6 years	11
Child 7–10 years	13
Child 11–14 years	15
Child 15–18 years	18
Male 19–59 years	18
Male 60–74 years	16
Male 75+ years	14
Female 19–74 years	14
Female 75+ years	12
Breastfeeding	Add 4
Third trimester pregnancy	Add 1

The number of units and quantity of gluten-free food per month recommended by a dietitian may vary from the approximate monthly requirement as determined by age and sex alone. It may be fewer, or greater, depending upon the clinical need, and the individual's energy requirements. Some flexibility in prescribing is necessary to reflect patients' variable therapeutic and nutritional needs, taste preferences, lifestyle, activity and seasonal changes in eating habits. Dietary education will focus on self-management to enable the patient to identify suitable gluten-free alternatives and replace the excluded gluten-containing foods.

Dietician recommendations may also include:

- addition of, or substitution with, new or alternative foods, within recommended unit norms.
- reductions or increases in quantities of each food product, within recommended unit norms.

For some fresh foods, e.g. bread, handling charges may apply; which makes the cost of supplying small quantities of the food disproportionately large. Prescribers and pharmacists should work together to order appropriate quantities of products with handling charges, and it is worth noting that some foods can be frozen for future use.

6.0 Prescribing of gluten-free foods

6.1 Who can gluten-free foods be prescribed for?

Gluten-free foods can be prescribed for patients diagnosed with coeliac disease or dermatitis herpetiformis who do not wish to use the GFFS, or for whom it is inappropriate or who live in an area where GFFS is not currently available.

6.2 What gluten-free foods can be prescribed?

In conditions where foods have characteristics of medicines, the Advisory Committee on Borderline Substances (ACBS) advises as to the circumstances in which such substances may be regarded as drugs and provides a list of the food products recommended in accordance with the Committee's advice. ACBS state that doctors should satisfy themselves that the products can be safely prescribed, that patients are adequately monitored and that, where necessary, expert hospital supervision is available.

Prescriptions for products recommended by the Committee should be endorsed with 'ACBS'³.

All ACBS-approved food products that are gluten-free or gluten- and wheat-free except cake mixes and luxury items are recommended for prescribing and Table 3 provides additional guidance on the circumstances suitable for prescribing different types of gluten-free products. The most up-to-date list of ACBS-approved gluten-free food products for prescribers in Wales is available in the [Drug Tariff](#) (Part XV – Borderline Substances – List A). [Appendix 1](#) presents the list of products listed in the April 2026 Drug Tariff and includes additional information on weight/presentation and unit values for each food product adapted from information made available to Coeliac UK by product manufacturers.

As nutritional content and ingredients vary, a sufficient range of products is required to accommodate the therapeutic needs of patients, for example increased calcium requirements, multiple intolerances or constipation. Variety and acceptability of the diet can also improve adherence, which can improve outcomes. Therefore, it is not recommended to have a narrow formulary of gluten-free food products.

6.3 Classification of gluten-free foods

This guide provides a categorisation of gluten-free food products approved by ACBS according to whether they are recommended as a staple food (green) or not recommended in most circumstances for prescribing (red).

Table 3 outlines the food product types in each category and states the circumstances in which they may be prescribed for patients in Wales.

Table 3. Categories of ACBS-approved gluten-free food products and circumstances in which they may be prescribed.

Recommendation category*	Type of gluten-free food product	Circumstances suitable to prescribe the gluten-free food products
Staple	All types of bread, rolls or baguettes; all flour-type mixes (except cake mix); fibre-containing breakfast cereals; pasta; crackers; crispbreads; oats; pizza bases listed in Appendix 1	Diagnosis of coeliac disease or dermatitis herpetiformis
Not recommended for prescribing	Biscuits; cakes and cake mixes; non-fibre-containing breakfast cereals listed in Appendix 1.	In exceptional circumstances (for example, children with type 1 diabetes needing a carbohydrate snack) biscuits may be requested by the dietitian

* This advice does not affect the clinical freedom of the prescriber.

6.4 Quantities of gluten-free food products to prescribe

The recommended unit requirements of gluten-free food for each group can be used to calculate examples of the quantity of different gluten-free food products that would fulfil this unit requirement in a monthly prescription. Table 4 provides examples to aid prescribing decisions and [Appendix 1](#) lists the unit values for individual products.

Table 4. Examples of the quantity and type of gluten-free food products to prescribe monthly based on recommended unit calculations per age group

Age group	Recommended units per month ²	Example of Gluten-free products to prescribe*
Child 1–3 years	10	6 x 400 g loaves of bread (or 3 x 500 g mix suitable for making bread) 2 x 300 g breakfast cereal 1 x 250 g pasta
Child 4–6 years	11	6 x 400 g loaves of bread (or 3 x 500 g mix suitable for making bread) 2 x 500 g pasta 1 x 300 g pizza bases
Child 7–10 years	13	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 1 x 500 g pasta 1 x 300 g breakfast cereal 2 x 175 g mini crackers 1 x 300 g pizza bases
Child 11–14 years	15	6 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 2 x 300 g breakfast cereal 2 x 500 g pasta 2 x 300 g pizza bases
Child 15–18 years	18	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 4 x 500 g pasta 2 x 300 g pizza bases
Male 19–59 years	18	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 3 x 500 g pasta 1 x 500 g gluten-free oats 1 x 300 g pizza bases 1 x 200 g crackers/crispbread
Male 60–74 years	16	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 1 x 300 g breakfast cereal 2 x 500 g pasta 2 x 200 g crackers/crispbread

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Age group	Recommended units per month ²	Example of Gluten-free products to prescribe*
Male 75+ years	14	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 1 x 500 g pasta 1 x 300 g fibre flakes 2 x 200 g crackers/crispbread
Female 19–74 years	14	8 x 400 g loaves of bread (or 4 x 500 g mix suitable for making bread) 2 x 500 g pasta 2 x 200 g crackers/crispbread
Female 75+ years	12	6 x 400 g loaves of bread (or 3 x 500 g mix suitable for making bread) 1 x 500 g gluten-free oats 1 x 500 g pasta 2 x 200 g crackers/crispbread
Breastfeeding	Add 4 units	1 x 500 g pasta 1 x 200 g crackers/crispbread 1 x 400 g loaf of bread
Third trimester pregnancy	Add 1 unit	1 x 200 g crackers/crispbread
* Items can be interchanged, e.g. bread mixes can be interchanged with rolls or loaves.		

185 **References**

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3. NHS Business Services Authority. NHS Electronic Drug Tariff - Part XV Borderline Substances - List A. 2026. Available at: <https://www.nhsbsa.nhs.uk/pharmacies-gp-practices-and-appliance-contractors/drug-tariff>. Accessed Feb 2026.
4. Coeliac UK. Living gluten free FAQs - What is gluten free wheat starch? 2026. Available at: <https://www.coeliac.org.uk/about-coeliac-disease/living-gluten-free-faqs/>. Accessed Jan 2026.

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Appendix 1. ACBS-approved gluten-free products considered suitable for prescribing in Wales

(This table is based on the NHS Business Services Authority 'Drug Tariff' [July 2026] and the Coeliac UK 'Prescribable products list' [February 2026] and was accurate at the time of publication – The most recent [Drug Tariff](#) should always be consulted before prescribing)

Patient name: _____ D.O.B: _____ Address: _____

No. of units prescribable per month (maximum): _____ Pharmacy: _____

(X) = product carries Coeliac UK cross grain symbol

(▲) = product contains gluten-free (Codex) wheat starch

Note: If a patient requires **vegan products**, ingredients will need to be confirmed on the manufacturer's website.

Product	Quantity required	Pack size	Unit value
Bread (400g = 1 unit)			
Genius			
Multi seeded farmhouse loaf(X)		6 x 550g	1 unit per 550g
Soft White Sandwich Loaf (X)		6 x 550g	1 unit per 550g
Seed brown Farmhouse Loaf (X)		6 x 550g	1 unit per 550g
Glutafin Gluten-Free			
Fibre Sliced Loaf		300g	1
White Sliced Loaf		300g	1
High Fibre Loaf sliced		350g	1
Glutafin Gluten-Free Select			
Fresh Brown Loaf Sliced		8 x 400g	1 unit per 400g
Fresh White Loaf Sliced		8 x 400g	1 unit per 400g
Seeded Loaf (sliced)		400g	1
Fresh Seeded Loaf Sliced		8 x 400g	1 unit per 400g
Fibre Loaf Sliced		400g	1
White Loaf Sliced		400g	1
Juvela			
Fibre Loaf Sliced (X) (▲)		400g	1
Fibre Loaf Unsliced (X) (▲)		400g	1
Fresh Fibre Loaf Sliced (X) (▲)		8 x 400g	1 unit per 400g
Fresh White Loaf Sliced (X) (▲)		8 x 400g	1 unit per 400g
White Loaf Sliced (X) (▲)		400g	1
White Loaf Unsliced (X) (▲)		400g	1
Fibre Part Baked Loaf (X) (▲)		400g	1
White Part Baked Loaf (X) (▲)		400g	1

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Product	Quantity required	Pack size	Unit value
Warburtons Gluten Free (Pharmacy)			
Sliced Brown Loaf (X)		4 x 400g	1 unit per 400g
Sliced White Loaf (X)		4 x 400g	1 unit per 400g
Baguettes, buns, rolls and speciality breads (400 g = 1 unit)			
Glutafin			
4 White Rolls		200g	0.5
2 Part Baked Baguettes		350g	1
Fresh White Rolls		260g	0.5
2 Part Baked Long White Rolls		150g	0.5
4 Part Baked Fibre Rolls		200g	0.5
4 Part Baked White Rolls		200g	0.5
Juvela			
Fresh Fibre Rolls (X) (▲)		5 x 85g	1
Fresh White Rolls (X) (▲)		5 x 85g	1
Fibre Part Baked Rolls (▲)		5 x 75g	1
White Part Baked Rolls (▲)		5 x 75g	1
Warburtons Gluten Free (Pharmacy) (Wheat, Gluten & Dairy Free)			
Brown Rolls (X)		4 x 232g	0.5 unit per 232g
White Rolls (X)		4 x 232g	0.5 unit per 232g
Breakfast cereals (300g = 1.5 units)			
Glutafin			
Cornflakes		375g	1.5
Juvela			
Corn Flakes (X) (▲)		375g	1.5
Crispy Rice (X) (▲)		375g	1.5
Fibre Flakes (X) (▲)		300g	1.5
Flakes (X) (▲)		300g	1.5
Pure Oats (X) (▲)		500g	1.5
Crackers, crispbreads & breadsticks (150–200g = 1 unit)			
Glutafin			
Crisp Bread		150g	1
Crackers		210g	1
Mini Crackers		175g	1
Juvela			
Crispbread (X)		200g	1
Pizza bases (220–360g = 1 unit)			
Glutafin 2 Pizza Bases		300g	1
Baking aids (1 tub = 1 unit)			
Innovative Solutions Pure Xanthan Gum		100g	1

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Product	Quantity required	Pack size	Unit value
Flour mixes (500g = 2 units)			
<i>Finax</i>			
Flour Mix (▲)		3 x 900g	4 units per 900g
Coarse Flour Mix (▲)		3 x 900g	4 units per 900g
Fibre Bread Mix (▲)		3 x 1kg	4 units per 1kg
<i>Glutafin Gluten-Free</i>			
Bread Mix		500g	2
Multipurpose White Mix		500g	2
Fibre Mix		500g	2
<i>Glutafin Gluten-Free Select</i>			
Select Bread Mix (▲)		500g	2
Select Fibre Bread Mix (▲)		500g	2
Select Multipurpose Fibre Mix (▲)		500g	2
Select Multipurpose White Mix (▲)		500g	2
<i>Innovative Solutions (Pure)</i>			
Bakery Blend		1kg	4
Brown Rice Flour		500g	2
Potato Starch		500g	2
Tapioca Starch		500g	2
Brown Teff Flour		1kg	4
White Teff Flour		1kg	4
White Rice Flour		500g	2
<i>Juvela</i>			
Fibre Mix (X) (▲)		500g	2
Harvest White Mix (X)		500g	2
White Mix (X) (▲)		500g	2
Pasta (250g = 1 unit)			
<i>Glutafin</i>			
Spaghetti		500g	2
Penne		500g	2
Spirals		500g	2
<i>Juvela</i>			
Fibre Penne (X)		500g	2
Lasagne Sheets (X)		250g	1
Fusilli (X)		500g	2
Macaroni (X)		500g	2
Spaghetti (X)		500g	2
Tagliatelle (X)		250g	1

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Product	Quantity required	Pack size	Unit value
Biscuits (150–200g = 0.5 unit)			
<i>Glutafin</i>			
Digestive biscuits		150g	0.5
Shortbread biscuit		100g	0.5

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