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September 19, 2005

U.S. Food and Drug Administration
Division of Dockets Management
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Gluten-free Labeling Docket #2005N-0279

To whom it may concern:

The Food Allergen Labeling and Consumer Protection Act (FALCPA) requires manufacturers to list all ingredients and flavorings by their common names on every food label, by January 1, 2006. Individuals with potentially fatal food allergies and those with celiac disease will soon have a significant line of defense against inadvertently consuming an ingredient, which for them, could be life-threatening.

Another provision of this bill, which will become effective in August 2008, relates specifically to new rules regarding the use of the term 'gluten-free.' Any additional labeling standards required by this law regarding use of the term 'gluten-free,' must include the following stipulations: 1) the words 'gluten-free' must be easy to read print and mean that a product is 100% gluten-free; and 2) to avoid confusion, a manufacturer may not use the term 'gluten-free' on food labels if the food in question never contained gluten. For example, manufacturers should not be allowed to put the 'gluten-free' label on a product such as applesauce, as this product has never contained gluten.

I appreciate the opportunity to communicate my thoughts on this matter, and hope that you find them helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd J. Slotkin".

Todd J. Slotkin
Chairman & President

2005N-0279

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