

Gluten Free Labeling should mean that the food is safe for ALL those with Celiac Disease, not just those who don't react to small amounts. Absolutely NO wheat starch should be allowed and no known ingredients derived from gluten grains (no matter how refined). Raw ingredients should be handled to eliminate cross contamination (including cleaning of transports and harvesting equipment - which should be done anyway, to avoid allergen contamination). Since Australian companies are testing with detection levels of 5PPM, this should be the required cutoff level for cross contamination -- and of the Raw ingredients, not processed ingredients included later (although testing for introduced contamination of processed ingredients should also be pursued). Since studies are showing that some of those diagnosed with CD also produce identical antibodies in response to Avenin (the protein in oats), the use of oats should not be allowed in any Gluten Free product.

If the use of low gluten containing ingredients is desired, to assist those who lack the will power to stay on their gluten free diet or who are not medically requiring a gluten free diet, then a second category, Low Gluten should be created -- use this for foods containing gluten derived ingredients and oats, but that test below a cutoff level for gluten (and since Canada and other countries are using 20PPM, with the EU considering the change, that cutoff should be used in the US - both to keep the US in line with international standards and to allow US products to be sold in those markets). These products can then be avoided by those who require a gluten free diet - along with those with IgE wheat allergies, who also cannot tolerate pseudo-gluten free foods. Allowing these low gluten foods to be labeled gluten free will essentially eliminate the usefulness of the label to those following a gluten free diet, as it will mean the label cannot be trusted (just as ingredient lists cannot now) and every single food will still have to be researched to find which ones are truly gluten free. This is especially true of foods that contain non-wheat gluten ingredients, such as malt (from barley) -- already some beer companies are telling customers they are gluten free (as are some soy sauce manufacturers, who claim the wheat or barley is destroyed by fermentation -- yet, experience has taught those with CD that this claim is untrue). Currently, malt is sometimes hidden under "natural flavorings" on labels and will still be allowed to do so under the new allergen labeling standards. Those with CD are looking forward to a time when gluten derived ingredients either cannot hide or when a trusted label will tell us that it isn't hiding.

There are some who believe that without adding "low gluten" wheat starch to the diet, people won't be able to remain gluten free. Generally, they claim that wheat starch bread is better in some way than other starch based breads -- nutritionally and taste wise, this is untrue (unless, of course, a significant amount of wheat protein remains). Now that many alternative grains are being sold, gluten free breads are being made that far surpass starch based breads in taste and texture. These contain protein and fiber, being primarily whole grains, and are much more in line with current nutritional recommendations than any all starch bread. Allowing wheat starch on a pseudo-gluten free diet only encourages poor nutrition in a group that already is challenged to absorb adequate nutrients from their diet. This is in direct opposition to current govt. efforts to get Americans to consume more whole grains (and 7 servings of starch a day is much, much worse than 7 servings of processed wheat flour a day, as it not only lacks nutrients to start with, but also the starch robs the body of additional nutrients, especially iron -- and iron deficient anemia is already a prime complication of celiac disease).

Currently, I spend hours a day researching products to determine what foods are truly gluten free or traveling to stores to locate the magic brands. For example: Mission Foods corn tortillas are gluten free, marked so on the label, made on separate lines, etc, while those from OleMexican are made in a shared facility with airborne flour nearly guaranteed to contaminate the end product - yet, there is no indication on the label of this. And although OleMexican's brands are sold in every store nearby, as are Missions flour tortillas, to get Mission's corn tortillas requires a trip across town. Those with CD who don't spend the time to either join an online support group and keep up with changes as they are discovered, or to call the manufacturer of every single product they buy must either stick to raw ingredients (and even here can get tripped up, as most "raw" foods in the grocery

store are somewhat processed these days) or they invariably end up with a fairly large amount of cross contamination in their diet -- leading to health problems and increased health costs nationwide. Just last year, a major company was found to be selling rice that used wheat starch as the binder in their enrichment formula -- they have since changed (and rice starch is the normal carrier when the grain is rice), but without constant checking with the company (at every trip to the grocer) or with an online community that helps share the load of such research, many more would have remained ill who were eating that companies products. Ingredient lists only provide a starting point, eliminating obvious sources of gluten - but many questionable ingredients are only "usually" gf or "gf if made in the US" (such as maltodextrin and citric acid - usually corn in the US, most likely wheat from the EU or China, but no way to find out the original source purchased in a US product without calling the company). Although imported food is easier to decide to avoid, it is much more difficult to determine it's gf status; however, just because the food is made in the US, there is no guarantee the ingredients used are from the US (although likely, the global commodity markets ensure that it isn't always true).

Please take this opportunity to get the law on Gluten Free Labeling right the first time. This will not only make shopping and eating safer for those with celiac disease and gluten intolerances, but will reduce costs for companies over the long haul, as they won't be subjected to later corrections and will be able to greatly reduce their customer service calls. As awareness of CD has increased, more are being diagnosed every day - current estimates put the US population that has Celiac Disease at between 2 and 3 million, all of whom are currently required to spend hours a day calling companies and researching every bite they eat.