

Docket # 2005N-0279

- 1) Gluten-free on a food label should mean the absolute absence of gluten in the food product. All individuals have a different level of sensitivity to gluten and no one's health should be jeopardized in the process of eating food labeled gluten-free. There is not significant research proving that even the most sensitive individual alive can handle minute quantities of gluten (about 20ppb) in every serving of food they eat at every meal over the course of sixty years. There will probably never be enough research on this because no one would submit their Celiac infant for testing of this nature for a lifetime (due to risk of death). There is no way to prove that this small amount of gluten will not build up in the individual's body over the course of a lifetime and cause serious illness and/or death.
- 2) I have spent countless hours identifying food as gluten-free by all means necessary. First, I look for foods labeled gluten-free and if that fails, then I email the company about their specific food products on a regular basis in order to catch manufacturing changes. I am also pursuing a degree in food science which allows me to learn about additives and gums and their gluten contents.
- 3) About 90% of the prepared foods and packaged food that I purchase are marked gluten free and made by companies with dedicated gluten-free manufacturing plants. The other 10% have been declared gluten-free by the company even though the product has not been labeled as such.
- 4) If there are two identical products in the store and only one of them is labeled gluten-free, I always buy the one labeled gluten-free. This is because products labeled gluten-free have been tested and proved gluten-free by the company, before they hit the supermarket. This is also because I know that not all companies have dedicated gluten-free lines, and thus cross contamination can occur at the plant level. Also, it is possible that the product was cross contaminated at the farm level by means of a gluten containing grain being blown onto it from a nearby farm. I also know that sometimes conveyor belt lines are coated with starch to prevent the food product (such as dried fruit) from sticking to the conveyor belt. These starches are not on the ingredients label because they are not an ingredient of the food, and thus there is no way to know if the product has been dusted until one gets sick. I also always buy the gluten-free labeled product because I know that as the cost of ingredients changes, the manufacturer changes the ingredients of the product. For example, if a company is making gravy and corn starch is cheapest in October, then they will use cornstarch to thicken it in October, but if wheat starch is cheapest in November, then the company will most likely switch to wheat starch. This is only a problem because sometimes the labels on the food product do not change when the ingredients do and the FDA cannot possibly find all of these problems before the food hits the shelf. I do not want to be part of the reason why there was a recall. It's not worth my health.
- 5) I would prefer that gluten-free meant "complete absence of all gluten-containing products and their derivatives", but if the FDA insists on allowing companies with 20ppb of gluten in their product to label their product "gluten-free" then I think that a multi-level definition would be helpful. Although, I would expect that the company would still have to put a disclaimer on their food such as "This product

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may contain up to Xppb of gluten” even if it’s labeled gluten-free. This would really help me make an informed decision and allow me to follow an absolutely gluten-free diet.

Thank you for taking my opinion.
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