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These comments are in response to questions provided by the Celiac Sprue Association in their efforts to provide the FDA with input from the celiac community.

1) What should "gluten-free" mean on a label? Why?

At a minimum, "Gluten-free" must mean the product has consistently tested at less than 20 ppm. Many of us have concerns that a strict 100% Gluten-Free requirement would limit our products considerably and may not even be achievable at this point in time. Could different terms be applied to indicate different standards? Possibly "100% Gluten-Free" for those products that actually meet that standard and "Gluten-Free" to indicate compliance with the proposed CODEX standard of 20 ppm. That would give celiacs and others with gluten issues the opportunity to make an informed decision based on their sensitivity to gluten and their individual opinion on the level of gluten that is acceptable.

2) How do you identify foods that do not contain gluten? Time spent identifying foods?

I always look for "gluten-free" labels, but in mainstream grocery stores, those are extremely difficult to find. My next choice is companies that have stated they do not hide ingredients (fillers, etc., not listed in the ingredients). Kraft is a good example of a company whose labeling policy is friendly to all those with special dietary restrictions. I try to find a product by a known company then read the ingredients listing for any offenders. If I still have not located a product I feel confident in using, I select the one that looks like it might be safe and that has the company phone number and/or website on the label. Then I either use my cellphone to call the company immediately or I purchase the product and go home to check the website. If the website does not have the appropriate information, I contact the company to resolve whether or not the product is safe for me. If it's not safe, I return it.

Immediately after my diagnosis, I spent literally hundreds of hours becoming knowledgeable on reading labels and researching products. It is still a daunting, time consuming task not only for me but also for my husband since he does some of the grocery shopping. It does become easier after base products have been identified, but you always have to recheck the labels. You can't assume anything. AND when you go on vacation, you are suddenly faced with a different group of brands and more phone calls or web checks. I

generally check internet availability at my destination and take my laptop with me when traveling to aid in this process. I'm also seriously considering the purchase of a PDA to provide greater convenience and flexibility. I consider myself very lucky to be able to afford such tools and recognize that product verification is bound to be much more difficult for those that do not have them.

3) What percentage of foods and which types purchased are marked "gluten-free"?

In mainstream stores I have found one brand of stocks (chicken, beef, and vegetable) that were actually labeled gluten-free, two salad dressings, a few flours and mixes in the specialty section, and Hormel diced ham. That's a very small percentage of the products that I buy. In health food stores, the percentage increases with the additions of cereals, frozen entrees, soup mixes, seasoning mixes, snack crackers, pastas, breads, tortilla chips and a better variety in flours. That's still not many products actually carrying a "gluten-free" label, but it is an improvement over the mainstream stores.

4) Does "gluten-free" printed on a product label influence your decision to purchase products having the same ingredients? To what extent?

It's a ***huge*** factor! Just because the ingredient list is the same on another product does not mean that the product is also "gluten-free". At a minimum, you would have to know the labeling policy of the company to know if there is a possibility of "hidden" ingredients or cross-contamination. I would buy the "gluten-free" product unless the other one was a product that I had already verified. And I probably would still buy the product labeled "gluten-free" reasoning that even if I had already verified the other product, there may have been changes since that was done. Additionally, I like to support the companies that are making the effort to add "gluten-free" to their product labels, even though I realize the term "gluten-free" does not currently have a standard definition within the U.S.

I hope these comments will be helpful in your task. The celiac community appreciates the FDA's attention to this matter.

Regards,

Kathryn Peaster