



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration  
Rockville MD 20857

MAR 8 2000

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Mr. Ray Gordon  
Post Office Box 732  
Pineville, Missouri 64856

Dear Mr. Gordon:

Thank you for your letter of August 29, 1999, addressed to Representative Roy Blunt, regarding food labeling. Representative Blunt has asked us to reply directly to you. We regret our delay in responding but trust that the following information is helpful.

You indicated your wife has a condition, celiac sprue, which causes intolerance to the protein component of the gluten in wheat, barley, rye, and oats. This means she needs to avoid food products containing these grains. You are concerned that food manufacturers are including these grains in their products without stating so on the label's ingredient statement. You requested legislation to require the disclosure of all ingredients on food labels.

By way of background, the Federal Food, Drug, and Cosmetic (FD&C) Act requires that all foods fabricated from two or more ingredients must declare each ingredient by its common or usual name in the ingredient statement in descending order of predominance by weight. The FD&C Act provides two narrow exemptions from ingredient labeling requirements. The first one provides that spices, flavorings, and certain colorings may be declared collectively without naming each one. The second one provides that incidental additives, such as processing aids that are present at insignificant levels and do not have a functional effect in the finished food, do not have to be declared on the label.

The Food and Drug Administration (FDA or the Agency) has recently received a citizen petition raising concerns similar to those raised in your letter and requesting FDA to amend its food labeling regulations to require the provision of source information for modified food starch, spices, natural and

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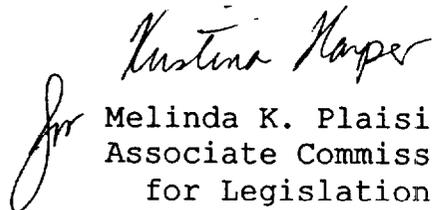
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artificial flavorings, and other non-specific ingredients. We have forwarded your correspondence to the docket for this matter for inclusion in the record. Please be assured that we will consider all comments before making a final decision on this issue.

FDA understands the difficulties faced by persons with food allergies and food intolerance. Being able to identify and avoid allergens and other specific ingredients is of great importance to such people. We have enclosed a Notice to Manufacturers that FDA distributed to food manufacturers, trade associations, and other food industry groups. It advises the industry on the steps that it needs to take to ensure that allergens are declared on food labels. FDA encourages manufacturers to specifically declare ingredients used as flavors and colors that are known allergens. Please note that wheat is included in the list of common allergens. While the Agency recognizes that celiac sprue is a food intolerance and not an allergy, we believe that the inclusion of wheat in the list will help enable persons with celiac sprue to avoid certain proscribed products.

We have enclosed an article from FDA Consumer magazine, "The New Food Label: Better Information for Special Diets," that may be of interest. We trust this information responds to your concerns.

Sincerely,

  
Melinda K. Plaisier  
Associate Commissioner  
for Legislation

2 Enclosures

cc: The Honorable Roy Blunt  
House of Representatives  
Washington, D.C. 20515

cc: Dockets Management Branch (#99P-2148/CP)  
HFA-305

ROY BLUNT

MEMBER OF CONGRESS  
7TH DISTRICT, MISSOURI

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Congress of the United States  
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Washington, DC 20515

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September 24, 1999

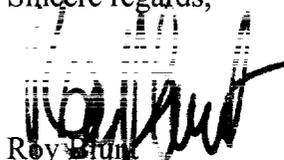
Commissioner Jane E. Henney  
Food and Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857

Dear Commissioner Henney:

Enclosed you will find a letter from my constituent, Mr. Ray Gordon, regarding adequate food labeling for certain food ingredients. I would greatly appreciate any information you could provide Mr. Gordon which addresses his concerns. I would also like to have a copy of your reply for my files.

Thank you for your time and assistance.

Sincere regards,



Roy Blunt  
Member of Congress

99-6363

SEP 08 1999

8-29-99

Hon. Roy Blunt  
Room 508 Cannon House Office Building  
Washington, D.C. 20515

RE: Inadequate food labeling requirements

Dear Roy:

Thanks for your prompt reply to my concerns about Y2K. I now have a more serious problem to discuss with you and to seek your help in resolving this problem.

My wife has been diagnosed with Celiac Disease, a non-communicable auto immune disease which makes her ill if she eats any thing with gluten (Wheat, Rye, Barley, or Oats). I am writing to you as I feel you can bring my concerns to the Food and Drug Administration and they will pay more attention to you than they will to me.

The problem is that food label requirements are inadequate to protect the many Americans who are afflicted with this disease. Enclosed you will find an internet page dealing with nebulous descriptions of food ingredients. Get some packaged food out of your kitchen pantry and you will see what I am talking about. The FDA requires that an ingredient named starch must be com starch, but the ingredient named modified food starch does not have to say whether it is made with wheat, corn, or something else. When mono and diglycerides are named, there is no requirement that the carrier (wheat or something else) be identified. These hidden, unidentified additives cause ongoing damage to the structures in the small intestine and can lead to vitamin and mineral deficiencies and even cancer. I trust you will use your influence to cause an important change in the food labeling laws to be made. Thanks for listening.

Sincerely,



Ray Gordon  
P.O. Box 732  
Pineville, Mo. 64856