

①

American Celiac Society Dietary Support Coalition
P.O. Box 23455
New Orleans, LA 70183-0455
504-737-3293 973-669-8808AmerCeliacSoc@netsscape.net



September 3, 2003

FDA

Dear Sir/Madam:

We have been advised that you are holding a public meeting on Codex Alimentarius issues on September 16, 2003. Unfortunately, we are not able to attend this meeting but would like to make a statement with regard to this issue.

It is the position of the American Celiac Society Dietary Support Coalition that on the Codex Alimentarius code the only acceptable standard for the code is "0" gluten.

Despite what some manufactures might say and some of the so called experts, Codex Alimentarius code allows manufacturers to hide under this code gluten containing food items including wheat, oats, barley and rye. It gives manufactures a stamp of approval to mark safe items that are unsafe food items for individual gluten intolerance. It places these individuals at risk for serious medical implications. The individuals suffering from food intolerance such as celiac disease are already placed at risk from vague labels in the United States such as food starch, natural flavors, artificial flavors, etc. If anything other than "O" gluten is accepted, these individuals are placed at a further risk to consume unknown gluten.

It has been reported over and over again that children diagnosed with celiac disease and placed on a total gluten free diet did remarkably well. In many cases these children were thought to have out-grown celiac or had been misdiagnosed and went back on a regular diet. Later as adults such individuals were rediagnosed with celiac disease. This proves that while apparent symptoms subsided for a short period of time, damage continued when gluten was re-introduced. Therefore, even the smallest amount of measurable gluten is unacceptable.

What the FDA needs to do is to place more restrictions on manufactures for total and clear identification of all ingredients in all foods, food supplements and medications.

Note that currently the code in Europe is per serving. No consideration is taken for the age, weight, or condition of the person. If this code allows gluten to be contained in supposedly gluten free products, an individual could become ill with even one serving such as a slice of bread. Someone consuming a sandwich would not know they had exceeded the so-called safe level.

We wish to stress the need for "O" gluten tolerance and not to permit manufacturers to profit on making people sick.

Thank you for your serious consideration of this important issue in order to maintain good health.

Sincerely yours,

Annette Bentley, BA, MSc
President

Advisory Board: Annette Bentley, President, ACSDSC; James R. Bentley, Vice President ACSDSC; Dr. Keith Benkov, Director of Pediatric Gastroenterology, Mt. Sinai Medical Center; Dr. Alessio Fasano, Director of Gastroenterology and Nutrition, University of Maryland School of Medicine; Dr. Peter Green, Clinical Professor of Medicine and Director of the Celiac Disease Center, at Columbia University, New York, NY; Dr. Martin Kagnoff, Division of Gastroenterology, University of CA San Diego; Dr. Donald Kasarda, Western Region USDA, CA; Dr. Elizabeth McDonald, gastroenterologist; Dr. Joseph Murray, Assistant Professor of Medicine, Division of Gastroenterology, Mayo Clinic; Maaritha Lee Palotta, LDN, RD, Clinical Dietician; Diane Schaefer, President, CSA/USA New Orleans Chapter