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Meeting of the Codex Committee on Nutrition and Foods for Special Dietary Uses
Public Comment on Draft Revised Standard for Gluten-Free Foods
Statement by Cynthia Kupper, RD, CD.; Gluten Intolerance Group®, Executive Director
September 1, 2003

Thank you for the opportunity to present the views of myself as the Director of the Gluten Intolerance Group®, representing our members with celiac disease; as the Chairman of Dietitians in Gluten Intolerance Diseases, a specialty group within the American Dietetic Association; as a member of the American Celiac Task Force; and as a person with celiac disease, regarding the Draft Revised Standard for Gluten-Free Foods. These comments are provided to assist in the development of draft U.S. positions to be discussed at the 25th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) in November 2003.

As a health care professional representing persons with celiac disease, a digestive disorder causing malabsorption and malnutrition related to altered metabolism of storage proteins found in wheat, rye and barley, I encourage the US Delegates to Codex Committee on Nutrition and Foods for Special Dietary Uses carefully consider that the final standards for gluten-free foods should be based on scientific evidence that: 1) demonstrates levels at which gluten is damaging to persons with celiac disease; 2) can be reliably and consistently measured in foods, at a reasonable cost to the food industry; and 3) that will be widely accepted by most countries as the standard used in their country.

I am aware of blind-study research currently ongoing in Italy and the USA in which it may be possible to determine a threshold for safe levels of gluten ingestion for persons with celiac disease. This type of information is vital for defining 'gluten-free' and assisting persons living a gluten-free lifestyle to be confident that foods labeled gluten-free will not be dangerous to their health. I believe with all the advances made in celiac disease research in the past few years that this type of information would be imperative in establishing accurate standards for gluten-free.

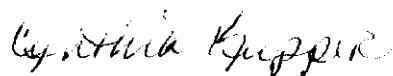
The CCNFSDU has clearly identified the importance of reliable testing for gluten-free status of foods be available. I feel that it is also important that the testing for gluten-free foods be available at a reasonable financial cost and time to the food industry. If widespread labeling of gluten-free status is to be encouraged, testing must be convenient for the food industry. It also seems reasonable that the specific testing methods, including approved reagent assays used, be specified in the Codex.

In conditions such as celiac disease, the world food market is small and very specialized. Gluten-free products are purchased from world-wide sources in the USA. It would be most useful for consumers if the standards set for gluten-free are embraced and accepted by a majority of countries. Most gluten-free food manufacturers are small companies, who may not be able to compete in a world-market that has different standards. This is helpful to manufacturers who also are interested in import/export for their products.

As a final note, I strongly encourage the USA Delegates to the CCFNSDU to work with the USDA and FDA to clearly define 'gluten-free' for the USA market. Manufacturers who contact me regarding the current standards for gluten-free in the USA are confused and interpret the codex and the USA position on gluten-free many different ways. As a dietitian and representative of people throughout the USA with celiac disease, I have cautioned manufacturers seeking advice on labeling products gluten-free to be absolute sure of their information on the USA guidelines for gluten-free. They are as frustrated as persons needing a gluten-free diet in knowing the best approach to safe gluten-free products.

Thank you for allowing me the opportunity to offer my suggestions on the draft revised standards for gluten-free foods. I appreciate the quality of the work done by the CCFNSDU and the entire Codex committee.

Sincerely,



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