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June 20, 2001

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FDA
Docket #OOP-1322

To whom it May Concern,

I am writing to express my concerns over current food labeling practices and my hope that new measures will be taken as a result of Docket#OOP-1322. I have two sons, ages 6 and 8, who each have multiple food allergies, which were diagnosed at the age of one. I have been label reading now for over seven years now and feel I have the equivalent of a college degree in the discipline.

My children are allergic to the following foods and therefore require strict avoidance. They are milk, eggs, peanuts, tree nuts and shellfish. When they were younger, they also had a reaction to a hot dog which was, according to the label "all beef" so we included the avoidance of nitrates on advice from our allergist as we did not know the origin of the reaction but now suspect it was a hot dog that was contaminated by production on shared manufacturing equipment where milk-containing products were also made. Let me also point out that my children each have life threatening sensitivity and have had anaphylactic reactions involving respiratory distress with each exposure to the allergens listed.

I wish to tell you how difficult life can be when you must constantly concern yourself with the content of each meal your child eats plus snacks. As children in nursery school I could not allow the staff to read labels and make decisions on food because of the numerous ways milk as well as egg are identified on labels. People have laughed at me for not allowing my kids to have tuna with their child for lunch because I was not sure of the brand and did not know if it was one that contained casein. No one believes me when I tell him or her I need to check the label when my child is offered an ice pop because it may contain milk. Some brands do contain whey. People have offered my children chicken and were surprised to find out it had a milk ingredient in it.

My kids are now enrolled in elementary school and although I have given all staff involved with my children a food label-reading guide they do not bother to use it. There are too many terms that describe egg and milk ingredients. The risk of making a mistake is too great when you are not used to label reading and its interpretation. Therefore my children can only eat foods that I have sent in from home. This is also impacting my kid's social growth. They are at the age where they can spend time at friend's homes without me. This leaves them in an awkward position when snacks are offered or if they might be invited to stay for dinner or a sleep over. The parent cannot easily read a label for the majority of parents have no idea what whey is and even less know that casein is a milk protein. I feel many parents don't want this responsibility out of fear of misreading labels and having to deal with an emergency situation or potential liability. I also cannot leave this responsibility on my children because they are too young.

This difficulty in label reading is also a problem for my family as well. My relatives have knowledge of my sons allergies and are familiar with most terms but have fear that

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they may miss something on the label that has one of the offending ingredients or milk, egg, peanut, tree nut or shellfish might be included in the 'natural flavorings' which is so often listed as an unknown entity. I have to leave a list of okay foods and mark them with my son's name in my own home whenever I leave them with a babysitter because the sitter, whether it is a family member or neighbor, cannot simply read the label and clearly see the word milk etc. and know it is not an appropriate food.

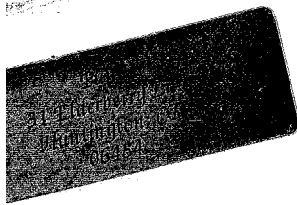
The interpretation of reading labels also extends into the restaurant industry. I have found that all chefs do not have equal understanding and knowledge of food ingredients and definitions that are used to describe milk etc.. This also further complicates the issue when trying to dine out with my food allergic children.

It is my hope that new food labeling guidelines will become a reality and that by sharing a part of my families struggle with label reading which we have to deal with every day of life, you can better understand why this is so important. I know I will no longer feel the degree of isolation a food allergy imposes if everyone who purchases a food item can read the ingredients as effectively as I can.

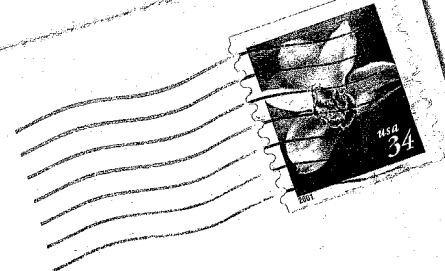
Thank you for your time and attention.

Sincerely,

Mrs. Karen Pun



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