

Subject: "Gluten-Free" food labeling

From: Richard Turner (richnimrod@yahoo.com)

To: ~~Richard Turner~~ FDA cc to CSA

Date: Wednesday, September 28, 2011 5:12 PM

Ladies and Gentlemen:

I am commenting on docket # FDA-2005-N-0404.

I am a celiac patient. As such I must restrict my intake of foods and beverages (*as well as pharmaceuticals...anything by mouth*) for the rest of my life, to strictly gluten-free choices. Making such choices is very difficult since there is no definition as yet agreed upon by the FDA for the term(s); "Gluten-Free". I know the comment period is currently open with the aim to arrive at such a definition. For that I am certainly grateful.

Following are my comments in this regard.

The only meaningful definition that makes sense and is protective for those consumers most in need of such protection (celiac patients) is as follows: **"Gluten-Free" means free from ingredients derived from any and all sources including, but not limited to: wheat, barley, rye and common oats; and tested/proven to contain 5 ppm or less of gluten in the finished product.**

The term "Low-Gluten" will not be of benefit to a person with celiac disease, since a safe level of gluten consumption has never been established medically for such patients. Such a label (low-gluten) may be of use to people following a fad diet; but would be confusing to newly diagnosed celiac patients; therefore I don't believe it to be a good idea.

Currently the term(s); "Gluten-Free" aren't always helpful, since no rules currently define those words. It will certainly be welcome if/when the FDA defines the use of "Gluten-Free" for use on product labeling as I noted above.

To be truly meaningful and helpful to those of us who really depend upon product labels to make sickness-or-health decisions whenever we shop in the grocery store the words; **"Gluten-Free" must mean: "tested and proven to contain 5 ppm or less of gluten in the finished product"**. Other than that, we won't be improving the uncertainty we now deal with each time we shop for foods/beverages /pharmaceuticals.

It is my belief that the FDA is charged with assuring safe and wholesome foods on grocery shelves throughout the USA. Foods that contain more than 5 ppm of gluten are neither safe nor wholesome for consumption by celiac patients.

Thank You for taking time to consider my comments.

Sincerely,

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