## submissions

From:

submissions

Subject:

FW: 15-02-06 FSANZ Submissions - Proposal P1035 Submissions

From: John O'Brien

Sent: Friday, 6 February 2015 12:27 PM

To: submissions

Subject: 15-02-06 FSANZ Submissions - Proposal P1035 Submissions

Hello Colleen and the Submissions team.

As a manufacturer of gluten-free beer, we whole-heartedly support Proposal P1035 – Gluten Claims about Foods containing Alcohol.

The reasons being that:

- 1. We do not agree that "gluten free" is a nutrition or health and related claim. The omission of gluten is no more a nutrition or health related claim than the omission of any other potential ingredient. For example, we filter our water to remove chlorine would this be considered a nutrition or health and related claim if we said our beers were "chlorine free"?
- 2. Gluten is an allergen. All other foods are required to list allergens (including gluten) or words to that affect (e.g. "made from wheat", "made from barley" or "contains wheat") to advise consumers that a product contains allergens like gluten. The current Standard 1.2.7 reverses this advice requirement which puts it at odds with other FSANZ standards. If anything, and to ensure a consistent approach across all standards, all non gluten free alcoholic beverages should state that they contain gluten, not the other way around.
- 3. We believe that "gluten free" is a an advisory message, a guarantee if you like, to the many Australians that have a reaction to gluten and that rely on this advisory message. To remove this message makes no sense.

Please add my contact details to your database to ensure we are kept updated on the progress of Proposal P1035 and kept advised of any further proposals in relation to gluten.

Kind regards,

## John O'Brien







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