

19 December 2014

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
AUSTRALIA

**Re. Submission –
Proposal P1035: Gluten Claims about Foods containing Alcohol**

Dear Sir/Madam

I write on behalf of Coeliac Australia (CA). CA is a national not-for-profit association, comprising five state organisations supporting people with coeliac disease.

CA wishes to make a submission in regard to the Proposal P1035, which proposes to permit nutrition content claims about gluten in relation to foods (including beverages) containing more than 1.15% alcohol by volume to continue to be made when Standard 1.2.7 becomes mandatory in January 2016.

CA is in support of allowing gluten free claims on alcohol containing food and beverages.

The following considerations have been made when forming our position:

- 1) The proposed amendment will allow gluten content claims about food containing alcohol to continue under the same conditions that were in place in Standard 1.2.8 (before Standard 1.2.7 was gazetted).
- 2) Any nutrition content claim made about the gluten content of a food would have to be made in accordance with the conditions specified in clause 11 and schedule 1 of Standard 1.2.7.
- 3) The inclusion of gluten in a nutrition information panel would be required for alcohol containing food and beverages making a gluten free claim (as per current requirements).
- 4) Without this amendment, there will be no way to ensure consumers with coeliac disease receive information about the gluten content of food/beverages in this category:
 - a) Gluten free claims would no longer be permitted on alcoholic beverages (specifically beer) – including those that are currently labelled 'gluten free'.
 - b) There is no requirement to declare the presence of gluten in beers and spirits.
 - c) Most alcoholic beverages are not required to provide ingredient information on pack.
- 5) FSANZ did not specifically consider gluten content claims in relation to food containing alcohol and inadvertently included them in the list of prohibited nutrition content claims. A gluten free claim is unlike most other nutrient claims, as that while not a 'health claim', it benefits only those with coeliac disease for whom the sole treatment is lifetime avoidance of gluten.

The proposed amendment will enable consumers with coeliac disease to continue to make suitable choices appropriate for their condition, within the range of alcoholic beverages and other foods containing alcohol. If gluten free claims are not allowed, it would not only deny those with coeliac disease access to essential information but may lead some to risk-taking behaviour.

As a consumer organisation, we appreciate the opportunity to make this submission in the interests of those with coeliac disease.

Please don't hesitate to contact me with any queries.

Yours sincerely



Tom McLeod
President
Coeliac Australia