



Canadian Celiac Association

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Consultation 2017: Beer Compositional Standards

The Canadian Celiac Association appreciates the opportunity to respond to the recent notice of intent to amend the *Food and Drug Regulations* to update the beer compositional standards. The following outlines our concerns and recommendations:

Allergen, gluten and sulfite labelling

The 1220 — Enhanced Labelling for Food Allergens and Gluten Sources and Added Sulphites Regulations that was passed in 2011 and came into effect in 2012 required priority allergens, gluten sources and added sulphites to be declared in the list of ingredients or “Contains” statement on the label of pre-packaged foods and beverages. During the consultation phase, the Canadian Celiac Association, along with many other medical, dietetic and patient advocacy organizations, strongly supported Schedule 1220. However, the Canadian Celiac Association and other groups strongly objected that standardized beer would be exempted from these regulations. Unfortunately, standardized beer did receive the labelling exemption which is a major health and safety concern for those with celiac disease or food allergies as they are unable to discern from the label if the product contains any gluten, major allergens or added sulphites.

This new 2017 consultation on beer compositional standards provides the opportunity to resolve the safety issues for individuals with celiac disease and food allergies.

Recommendation #1

The Canadian Celiac Association strongly recommends that the names of all gluten sources, priority allergens and added sulphites, when used in standardized beers, be declared on each individual container of beer as well as the outside packaging of these products.



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Definition of Beer

Individuals with celiac disease must follow a strict, life-long gluten free diet which places significant limitations on food and beverage options. Given the popularity of various types of beer, ale and lager, many individuals with celiac disease are looking for an alternative to gluten-containing beer. The product that they are/will be looking for is one labelled 'gluten-free beer'.

For beverages fermented from gluten-free grains/other ingredients, the proposed amendments would not permit the use of the term 'gluten-free beer' but rather "gluten-free beverage." This would be very confusing for gluten-free consumers as the term 'beverage' could include many different non-beer alternatives such as wine, distilled alcohols, liqueurs, ciders and non- alcoholic beverages (e.g., juice, milk, smoothies, etc.).

Recommendation #2

To avoid misleading consumers, the Canadian Celiac Association recommends the use of the term 'gluten- free beer' for beer-type beverages that utilize gluten-free grains and ingredients such as sorghum, millet, rice, etc.

However, there are currently some beers made with malted barley and a special clarifying agent that are labelled "gluten free". The manufacturers claim these beers are rendered gluten free. Unfortunately, this agent impacts the R5 Competitive ELISA's ability to accurately detect gluten, thus, a negative test result does not mean the product is indeed safe for individuals with celiac disease. (see references, page 3). It is not known whether these agents can completely remove all toxic fragments from gluten-containing beers and as such, labelling of these products as 'gluten-free beer' should not be permitted.

Recommendation #3

Beers made with malted barley and a special clarifying agent should not be labelled "gluten-free beer" because the clarifying agent interferes with the accuracy of the R5 Competitive ELISA that detects gluten contamination.

Thank you for careful consideration of our three recommendations.

Respectfully submitted,

The Professional Advisory Committee, Canadian Celiac Association

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