



Consumer Protection and Market Fairness Division
Food Safety and Consumer Protection Directorate
Canadian Food Inspection Agency
1400 Merivale Road
Tower 2
Ottawa, Ontario
K1A 0Y9

Re: Notice of intent: Amendments to Canada's vodka standard

Dear Director,

This is in response to the Health Canada's recent Proposed Change to the Vodka Standard as outlined at <http://www.inspection.gc.ca/about-the-cfia/accountability/consultations-and-engagement/notice-of-intent/eng/1547142819027/1547142850073>

Individuals with celiac disease must follow a strict, life-long gluten free diet which places significant limitations on food and beverage options. Even small amounts of gluten (50 mg) may induce an intestinal mucosal reaction, cause symptoms and lead to long term health complications.

The proposed changes to the vodka standard will, "Expand the permitted raw ingredients from potato or grain spirits to any agricultural material; allow for the use of other materials or processes, beyond charcoal, to fully or partially (in the case of raw ingredients other than potato or grain) render the product without distinctive character, aroma, or taste; and require additional labelling when sources other than potato or grain are used and when some characteristics from the raw ingredients remain in the finished product, such as "apple vodka" produced from apples with the taste of apples in the finished product."

The Canadian Celiac Association's Professional Advisory Committee fully endorse the labelling requirement of this new standard. It is critical for individuals with celiac disease to know whether gluten is one of the components of any food product and mandatory labeling would ensure that gluten would not be inadvertently ingested.

Sincerely,

Dr. Don Duerksen
Chair, CCA Professional Advisory Council

Cc: Treena Duncan, CCA President

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