



March 22, 2023

Open Letter to Parliament of Canada

**Re: Food inflation relief for Canadians with celiac disease**

I am writing on behalf of Celiac Canada, a federally registered charity with a vision to ensure that every person living in Canada with celiac disease is diagnosed and empowered. **We are asking the federal government to provide some financial relief by way of a federal benefit to Canadians with celiac disease to help manage the high cost of gluten-free food.**

Celiac disease is a serious autoimmune disorder in which the ingestion of gluten triggers a reaction that results in damage to an individual's small intestine. This damage impedes the body's ability to absorb nutrients, leading to a range of complications including gastrointestinal problems, anemia, infertility, chronic fatigue, chronic rashes, neurological damage, osteoporosis and even some cancers. Celiac disease affects **one percent** of the Canadian population.

**The only known treatment for celiac disease is a strict gluten-free diet.** Gluten comes from wheat, barley, rye, triticale and their hybrids. In Canadian grocery stores, gluten is everywhere. It is found in most processed foods: bread, cereal, soup, sauces, pasta, frozen meals, cookies, and crackers. Even unprocessed foods that do not naturally contain gluten, such as corn, seeds, pulses and oatmeal, are frequently "cross-contaminated" with gluten because they are stored, transported or processed in facilities that also handle gluten-containing grains.

Fortunately, some food companies have been willing to invest in technology, separate facilities, and dedicated supply chains in order to produce safe gluten-free food. However, production costs for these products are much higher than for gluten-containing food. **This means that Canadians with celiac disease pay significantly more for food than those without celiac disease.**

The economic burden of celiac disease is significant. Consider the following statistics for example:

- A 2017 study of 21 grocery stores in the Maritimes found that the median price of 2,226 gluten-free products was \$1.76/100g, compared to \$1.01/100g for gluten-containing



products.<sup>1</sup> In other words, **gluten-free products in the Maritimes were more than 74% more expensive than gluten-containing products.**

- In Manitoba, a 2021 study of 12 grocery found the median cost of 819 gluten-free products was \$1.50/100g, compared to \$0.65/100g for gluten-containing products.<sup>2</sup> **Gluten-free products in Manitoba were therefore more than 130% more expensive than gluten-containing products.**
- International studies have indicated that **the cost of a gluten-free diet can be as much as 518% more expensive than a gluten-containing diet** in some areas.<sup>3</sup>

The government is well aware that food inflation is hurting all Canadians. The cost of food overall in Canada rose by 10.4% from January 2022 to January 2023, with the price of fresh fruit rising by 9.1%, vegetables by 13.5%, baked goods by 9.7%, and meat by 9.8%.<sup>4</sup> As a result of food inflation, more Canadian households are facing more acute food insecurity than in the past, with 51% of Canadian households reporting it is very difficult to feed their households.<sup>5</sup> As Celiac Canada continues its outreach and research, we expect this percentage to be even higher for households that must also absorb the costs of medically necessary gluten-free food.

### **Simply put, Canadians with celiac disease face a cost-of-living crisis.**

A very concerning 2022 study by Boston Children's Hospital and Harvard Medical School found that food insecurity generally and gluten-free food insecurity specifically both increased during the COVID-19 pandemic, to the point that **1 in 10 households with a child on the gluten-free diet intentionally consumed gluten containing food due to limited ability to access/afford gluten-free food.**<sup>6</sup> It is hard to imagine the level of desperation that would cause a parent to feed a child food that will harm the child's health and cause them pain.

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<sup>1</sup> Jamieson JA and Gougeon L Can J Diet Prac Res. 2017; 78: 192-196.

<sup>2</sup> Jeged O, et al. Plant Foods for Human Nutrition, 2021; 76: 196-202.

<sup>3</sup> The Socioeconomic Impact on Presentation and Clinical Course of Celiac Disease: 1170 October 2019 The American Journal of Gastroenterology 114(Supplement):S652-S653.

<sup>4</sup> Source: Statistics Canada: [Consumer Price Index by Product Group](https://www150.statcan.gc.ca), found at <https://www150.statcan.gc.ca>.

<sup>5</sup> Cutting back: Nine-in-ten Canadians now tightening household budgets as inflation, high prices persist - Angus Reid Institute.

<sup>6</sup> FOOD INSECURITY INCREASES THE ODDS OF INTENTIONAL GLUTEN EXPOSURE

Du, N.; Mehrotra, I.; Weisbrod, V. M.; Regis, S.; Silvester, J. A. *Gastroenterology* ; 162(7):S-280, 2022. See also Effects of Income and Resource Insecurity on the Clinical Course of Celiac Disease During the COVID-19 Pandemic Block, Peter D. MD, MSc; Cao, Christopher MD<sup>1</sup>; Robbins, Justin MD<sup>1</sup>; DiMarino, Anthony J. MD; Moleski, Stephanie MD The American Journal of Gastroenterology: October 2020 - Volume 115 - Issue - p S651-S652.



The federal government offers some modest relief to Canadians with celiac disease by offering a medical expense tax credit based on the additional (incremental) cost of gluten-free food. However, the regime is not available to Canadians without taxable income, nor is it accessible: in a 2022 survey of Canadians with celiac disease, we found that 71.43% (n=220) of potentially eligible individuals had not filed a claim because they found the tax credit system too complicated.

We have written to the Canada Revenue Agency to seek improvements to the tax system. However, in addition to these improvements, **Celiac Canada believes there is a need for additional federal income support to enable Canadians with celiac disease to afford medically necessary food.** This could be a stand-alone food inflation relief benefit offered only to Canadians with celiac disease; or it could be an additional amount added to a broader food inflation relief benefit.

Ultimately, we are aware that policymakers must account for many factors as they consider how to combat food inflation. Celiac Canada is eager to assist by providing input and advice to help push for progress on this matter.

We look forward to your response.

Sincerely,

Melissa Secord, CAE  
National Executive Director