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[By email to frederique.ries@europarl.europa.eu](mailto:frederique.ries@europarl.europa.eu)

13 September 2012

Dear Ms Ries

I am writing to you regarding the proposals to repeal Regulation 41/2009 following our General Assembly held last week. We are grateful for the concern and energy you have shown in protecting the interests of people with coeliac disease.

As you know there has been much debate on the repeal of the Regulation 41/2009 among the national coeliac societies of Europe and the best way forward. We have agreed the following statement of our position on the issue.

“AOECS has followed the consultations at European level to revise the PARNUTS Framework in recent months very closely. Coeliac disease is recognised as a life-long and life-threatening immune-mediated pathology. The only evidence-based treatment for coeliac disease is a strict life-long adherence to the gluten-free diet. Therefore we regret that an adherence to the Regulation (EC) No 41/2009, which was first created for the safety of coeliacs in Europe, is not possible in the previous form. In view of this, we discussed the various consequences that are presented both by the EU Commission and the EU Parliament to integrate the contents of the Regulation (EC) No 41/2009 into other regulations.

As a result AOECS supports the proposal of the EU Commission, but only if it meets the following criteria:

1. The integration of the rules of the Regulation (EC) No 41/2009 into the Food Information to Consumers (FIC) Regulation (No 1169/2011) may not entail a loss of security for gluten-free foods in Europe.
2. Products which have the oats as an ingredient, may in future only be labelled as gluten-free, if they are below the limit of 20 ppm.
3. The content of Regulation (EC) No 41/2009 must be completely covered by the FIC Regulation (EC) No 1169/2011. It must not be put into effect by the use of delegated acts, as this would lead to a significant loss of security for coeliacs in Europe.

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4. AOECS expects that the integration of the rules of the Regulation No (EC) 41/2009 into the FIC will also have positive effects for coeliacs on the labelling of loose foods.
5. We expect a follow-up evaluation of the consequences of the new legislation by the Commission three years after the changes were set into force.

Should the above criteria not be fulfilled by the legislator, AOECS requests alternative solutions, which guarantee at least as high a degree of safety, variety and standards for gluten-free foods in Europe as the Regulation (EC) No 41/2009."

If you would wish to discuss further we would be happy to do so. We are writing in a similar vein to Basil Mathioudakis, Head of nutrition, food composition and information, DG SANCO, European Commission.

I look forward to hearing from you shortly.

Yours truly,

Sarah Sleet on behalf of The Board of the AOECS

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