



**29 March 2021**

**Submission To:** Commerce Commission New Zealand Grocery Market Study

**Submission From:** Coeliac New Zealand Incorporated. [www.coeliac.org.nz](http://www.coeliac.org.nz)

**Background information about our organisation:**

Coeliac New Zealand is a not-for-profit organisation formed as an incorporated society in 1973 to promote the welfare of children and adults diagnosed with Coeliac Disease and dermatitis herpetiformis. We are a registered charity listed with the New Zealand Charities Commission. We rely on membership subscriptions, funding from our licensing programmes, grants from trusts lotteries and COGs, donations, and corporate relationships.

**Medical Advisory Panel**

Professor Andrew Day, paediatric gastroenterologist

Dr Kamran Rostami consultant physician and gastroenterologist

Sylvia North, NZ registered dietitian and integrative nutritionist

Anna Richards, NZ registered dietitian

Margaret Thorsen, NZ registered dietitian

Dr Clare Wall, PhD, NZ registered dietitian

Julie Leeper, NZ registered dietitian

Dr Kristin Kenrick, Senior Lecturer in Dept of GP and Rural Health

Dr Richard Steele, Immunologist

Dr Jonathon (Jon) Bishop, paediatric gastroenterologist

**Patron**

Dr Robert (Bob) Anderson, MBChB, BMedSc, PhD FRACP (Patron)

**Honourary Patron**

Dr Simon Chin, paediatric gastroenterologist (Honourary Patron)

**Background Information about Coeliac Disease:**

*People of all ages can have coeliac disease, and the importance of understanding the disease and how to manage a gluten free diet is particularly important for their wellbeing.* International research indicates there could be up to 100,000 people in our NZ team of 5 million with coeliac disease and of

those 30,000 are likely to be children under the age of 18. However, a large proportion of those are unaware they have the condition.

Coeliac disease is an autoimmune condition characterised by a chronic intestinal reaction to dietary gluten. The only recognised treatment is the adoption of a strict gluten-free diet, for life. Once the diet is adopted and carefully maintained the body will restore the intestinal damage triggered by gluten exposure given adequate time - and CD symptoms will have lesser impact on restricting wellbeing.

Following a gluten free diet can however be challenging for people with CD and in their whanau, carers, and cooks. Just a very small amount of gluten, commonly found in processed foods made from cereal grains including wheat, rye, barley, and oats can sustain intestinal damage and trigger symptoms.

Coeliac disease often presents with non-classical extra-gastrointestinal symptoms. A strict, lifelong gluten-free diet is the mainstay of treatment currently. Although a gluten-free diet is effective, there are recognised challenges, particularly from a social perspective, and especially during teenage years. A gluten-free diet is typically more expensive, which can contribute to non-adherence to the diet. The quality of information as to whether particular foods or ingredients are gluten-free, cross-contamination when eating in restaurants or travelling or when in hospital, and uncertainty regarding trace amounts of gluten in cosmetics, supplements and medications increase the burden of managing this disease. Gluten contamination may increase the potential risks for preventable long term complications and expenses related to that.

#### **Our Recommendations:**

1. We strongly encourage the removal of GST from fresh fruit and vegetables. As gluten free products tend to cost more, the removal of GST from fresh fruit and vegetables would help improve the affordability of nutrient, fibre rich food suitable for those following a gluten-free diet.
2. We also strongly support a wider offering of Gluten Free items as well as a look at the pricing of Gluten Free food.
3. We understand there have been COVID-related supply issues with some gluten free products but there needs to be alternative products readily available at supermarkets for people who must adhere to a strict gluten free diet.

Wendy Bremner

Pou Whakahaere General Manager

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***Our vision is that people with coeliac disease live healthy lives every day.***