



**Grains &  
Legumes  
Nutrition  
Council**

*Cultivating Good Health*

**Grains & Legumes Nutrition Council**

**Submission**

**Proposal P1031 Allergen Labelling Exemptions**

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## PREFACE

This submission has been prepared by Grains & Legumes Nutrition Council™ (GLNC), the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- GrainGrowers
- Bakers Delight
- Campbell Arnott's
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia

## INTRODUCTION

The Grains & Legumes Nutrition Council (GLNC) welcomes the opportunity to respond to the call for submissions in response to Food Standards Australia New Zealand (FSANZ) Proposal P1031 – Allergen Labelling Exemptions.

### Recommendation 1

GLNC supports the proposed exemptions and has no further comments in relation to:

- soybean oil that has undergone a complete refining treatment;
- tocopherols and phytosterols derived from the deodoriser distillate of fully refined soybean oil; and
- alcohol distillate made from wheat or whey.

### Recommendation 2

GLNC supports an exemption from labelling for glucose syrup derived from wheat starch but does not support the proposed limit of 10ppm.

GLNC recommends that FSANZ reconsider the proposed approach for glucose syrup derived from wheat starch and remove the limit or provide a limit of 20ppm.

### Rationale

While GLNC support an exemption from labelling for glucose syrup derived from wheat starch, the proposed limit of 10ppm is not supported for the following reasons:

- a) The lower level of 10ppm provides no greater level of protection and imposes an unnecessary restriction on manufacturers of glucose syrups from wheat which would in turn impact manufacturers of grain based food products containing glucose syrup derived from wheat starch, such as selected breakfast cereals, grain based bars, biscuits, crackers and crispbreads.
  - FSANZ concluded, “Based on the available clinical evidence and likely single meal consumption .... that wheat-derived glucose syrup with a gluten content of 10-20 mg/kg is likely to present a negligible risk to the majority of wheat allergic individuals.”
  - A large body of evidence from studies on consumers with Coeliac Disease demonstrates diets containing the small, but measurable amounts of gluten, at levels found in current ‘gluten free’, including ‘naturally gluten free’ products lead to healing of the intestinal mucosa. The totality of the data point to a maximum tolerated daily intake higher than 10mg, but lower than 100mg/day and indicate that wheat starch-based food is safe, provided it contains <100mg gluten/kg.<sup>1</sup>
  - In relation to wheat allergy - comparing the recommended Vital Reference Dose for IgE mediated wheat allergy to potential thresholds for gluten free labelling, the Codex guideline for gluten free of <20ppm, wheat-allergic consumers would be largely protected when selecting gluten free products manufactured in conformity to Codex guidance. Assuming all of the protein is gluten, 20ppm corresponds to the Reference Dose (1.0mg) in a 50g serving of food. These findings are consistent with those reported by FSANZ and support the safety of 20ppm for both coeliac and wheat allergic consumers.
- b) The level is inconsistent with the EU labelling exemptions.
  - The proposal to set a limit of 10ppm is not consistent with the EU labelling exemption in practice where a level of 20ppm of residual gluten is accepted in line with the Codex requirement for gluten free claims. As such the proposal does not support the promotion of consistency between domestic and international food standards or the promotion of fair trading in food with respect to setting the limit for glucose syrup derived from wheat.

- From discussions with the Australian Food and Grocery Council, GLNC understands a limit of 10ppm will likely impose significant extra cost on Australian business in order to continue to operate in both the local and global market.

In addition, GLNC supports the Australian Food and Grocery Council submission including the observations that dietary modelling undertaken by FSANZ is very conservative and as a result overestimates the potential consumption of glucose syrups from wheat and resultant risk to coeliac and wheat allergic consumers.

**Reference:**

1. [REDACTED] 2013. Commissioned by AFGC.