



P1031 Allergen Labelling Exemptions

September 2015

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on Proposal P1031 Allergen Labelling Exemptions for Food Standards Australia New Zealand.

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DAA interest in this consultation

DAA advocates for a safe, nutritious and sustainable food supply which provides food security for all Australians. DAA considers that food labelling regulation makes an important contribution to a safe food supply.

DAA is responsible for the Accredited Practising Dietitian (APD) program which is the foundation of self regulation of the dietetic profession in Australia. As experts in nutrition, APDs assist the population with the translation of food labels and health claims. APDs also provide nutritional expertise relating to the development of food products and labelling that must comply with the current regulatory framework.

Recommendations

DAA supports the proposed amendments to exempt the following food and ingredients from mandatory labelling requirements for allergens:

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

DAA supports the proposed amendments to exempt glucose syrup from wheat starch from mandatory labelling requirements, however recommend the proposed limit is increased to 20ppm.

Discussion

- 1. Is there further information about allergic consumers and health and safety aspects that you would like to provide for consideration? If so, please support your comments with appropriate references and/or data.**

No further information is required on health and safety aspects of the products.

Some concern was expressed by a DAA member about the risk to the public if the oils used in food manufacturing change due to various issues such as supply or cost and a less refined oil is substituted, resulting in a higher level of protein contaminant. DAA recognises that this is an issue for jurisdictions in monitoring and surveillance of the implementation of the Food Standards Code, rather than for FSANZ itself.

2. Is there further information about production methods and/or residual protein levels of the substances discussed above that you would like to provide for consideration? If so, please support your comments with appropriate references and/or data.

No further information is required on the processing methods.

In regards to the labelling exemption for glucose syrup derived from wheat starch, DAA recommends increasing the proposed limit of 10ppm, to a maximum level of 20ppm of residual gluten for the following reasons:

- FSANZ outlined in the submission document that
“Based on the available clinical evidence and likely single meal consumption, FSANZ concluded 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”.
- This will allow consistency with EU allergen labelling, which permits “gluten-free” foods with maximum 20ppm gluten in the food as sold to the final consumer¹.
- Local manufacturers of glucose syrups do not support the proposed limit of 10ppm as this level will impose significant extra cost on their business in order to continue to operate in the local and global markets.

3. Do you have suggestions as to preferred means of communicating these changes to interested parties?

The following organisations can disseminate the information to their members:

- Australian Society of Clinical Immunology and Allergy
- Dietitians Association of Australia
- Anaphylaxis Australia
- The Coeliac Society
- Australian Medical Association
- Australian Food and Grocery Council
- Schools
- Baby health centres

FSANZ could produce a pamphlet that can be provided to primary sources of nutrition education (e.g. APDs, doctors, paediatric health nurses) to give to consumers. FSANZ should also consider public advertising.

4. Are there other implications for interested parties from the proposed exemptions from allergen declarations that may require consideration? If so, please provide any suggestions you may have as to how these might best be managed.

The only concern is monitoring of suitably refined oils in products as outlined earlier.

5. Do you have further considerations to add to the cost benefit analysis?

DAA supports the exemptions as:

- Consumers with allergies will benefit from a larger range of food choices.
- Nutrition educators, such as Accredited Practising Dietitians, will have more time to educate clients on allergen free diets rather than explaining labelling laws.

6. Do you agree / disagree with the proposed exemptions? Please provide information to support your comments.

DAA recognises the need for food industry and the general public to have access to accurate information on food labels to assist them to make informed food choices.

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References

1. Starch Europe. EU allergen labelling of wheat starch derivatives and of gluten-free food. 2009. Available from: <http://www.starch.eu/communication-on-eu-allergen-labelling-of-wheat-starch-derivatives-and-their-use-in-gluten-free-food/>