

1 September 2020



Submission on Application A1175: Rapeseed protein isolate as a novel food

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Submission from: Allergy New Zealand Inc

Contact re Submission:

██████████, Allergy Advisor

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Allergy New Zealand does not support the application at this time. We believe the review of the risk to people with mustard allergy in New Zealand (NZ), and of the potential for rapeseed protein isolate to induce allergic reactions in individuals not already allergic to mustard, is inadequate.

There also appears to be an association for latex allergy - p27 Bra r 2: "Of 60 natural rubber latex-sensitive patients, 51 (82%) showed IgE binding to purified Bra r 2 in ELISA. In 4 out of 6 patients tested purified Bra r 2 (100 µg/mL) induced a positive skin reaction" (Hänninen et al. 1999), which has not been taken into account.

We are concerned that FSANZ is relying on there being a lack of case studies of mustard allergy in the Australian or New Zealand (NZ) populations, and that the Australasian Society of Clinical Immunology and Allergy (ASCI) website does not discuss mustard allergy, to determine the risk is low.

We recommend FSANZ consult directly with ASCIA to assess prevalence of mustard allergy in Australia and NZ, and how significant rapeseed protein isolate would be in relation to those with mustard and/or latex allergy; or potentially as a new allergy.

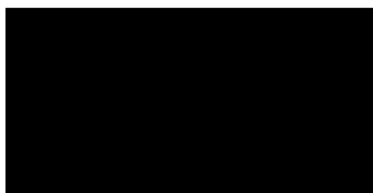
In populations where mustard allergy is common, mustard is on the list of allergens required to be declared (EU and Canada). As per EU reg: 2014/424/EU: Commission Implementing Decision of 1 July 2014 authorising the placing on the market of rapeseed protein as a novel food ingredient under Regulation (EC) No 258/97 of the European Parliament and of the Council (notified under document C(2014) 4256):

“The labelling of any foodstuff containing rapeseed protein shall bear an easily visible and legible statement that the product containing ‘rapeseed protein’ as a food ingredient may cause allergic reaction to consumers who are allergic to mustard and products thereof. Where relevant, this statement shall appear in close proximity to the list of ingredients.”

It would be useful for the assessment of this proposal, to have data from the EU in relation to the introduction of rapeseed protein, on cross-reactivity in those with mustard and/or latex allergy, and in consumer feedback in regard to the warning statement as above.

It should also be noted this EU regulation will need to be taken into account by Australian and NZ manufacturers intending to export to EU countries.

Kind regards



Allergy Advisor

Allergy New Zealand

