

Application A1175 Rapeseed protein isolate as a novel food

Call for Submissions

Submission

Summary

NSW appreciates the opportunity to comment on Application A1175 – Rapeseed protein isolate as a novel food (A1175).

NSW suggests that Food Standards Australia New Zealand (FSANZ) liaise with non-government organisations with specialist allergy and anaphylaxis knowledge (e.g. Australasian Society of Clinical Immunology and Allergy (ASCI), Allergy & Anaphylaxis Australia (AAA), Allergy New Zealand) and other allergen experts (e.g. Royal Prince Alfred Hospital Allergy Unit) to explore local exposure to mustard seed allergies/extent of recorded allergenic response in the Australian and New Zealand populations.

NSW had some preliminary conversations with AAA on this subject and understands there are some recorded local exposure and acute response symptoms to mustard allergies in the Australian population. There may also be recorded exposures in the NZ population.

Based on these explorations, there may be merit in considering consumer information risk management options (e.g. labelling/declaration options under Standard 1.2.3) for rapeseed protein isolate.

NSW is aware of foreign government action in this area, the Government of Canada has declared mustard a priority allergen¹ and it is also a declared allergen in the European Union².

Allergy risk assessment for A1175

One of the key public health and safety concerns identified in the risk assessment for A1175 was the potential for foods containing rapeseed or rapeseed products to induce an allergic response in individuals who are allergic to mustard. This is because rapeseed plants contain proteins which show an allergenic cross-reactivity with the proteins found in some *Brassica* species (such as mustard).

¹ <https://www.canada.ca/en/health-canada/services/food-nutrition/reports-publications/food-safety/mustard-priority-food-allergen.html>

² <https://www.anaphylaxis.org.uk/wp-content/uploads/2019/07/Mustard-2016.pdf>

NSW notes FSANZ allergy risk assessment conclusion in SD1 for this Application (pg 28):

FSANZ considers that rapeseed protein isolate has the potential to induce allergic responses in individuals who are allergic to mustard.

FSANZ current proposed risk management response to this finding is to inform ASCIA and consumer support organisations (e.g. AAA, Allergy New Zealand).

Mustard anaphylaxis in Australia

Anaphylaxis is the most severe form of allergic reaction and approximately 10 Australians die each year from anaphylactic reactions. These life-threatening reactions can be caused by the consumption of very small amounts of food, the smell of particular foods or even kissing someone who has eaten the food they are allergic to⁴.

AAA informed³ that there are known cases of anaphylactic reactions to mustard in Australia. The AAA website also mentions that mustard is one of 170 foods known to trigger severe allergic reactions⁴. NSW has contacted the Royal Prince Alfred Hospital Allergy Unit to seek further advice on this matter.

NSW suggests that FSANZ pro-actively engage these organisations and other expert bodies (e.g. Royal Prince Alfred Hospital Allergy Unit) to determine the extent of local recorded incidents of mustard seed allergy/anaphylactic response. If these investigations suggest acute anaphylactic response to mustard is evident in the Australian/New Zealand population – possible listing of rapeseed protein isolate in Standard 1.2.3 should be considered before this application progresses to an approval report.

Risk management approach

Contingent on outcomes of above proposed investigation, listing in Standard 1.2.3 would provide mustard allergy sensitive consumers with information to make informed purchase decisions. Such listing would provide for listing of rapeseed protein in all packaged food (even when present as a compound ingredient of less than five per cent of the final product) and for the food service industry to declare presence of rapeseed protein in food when requested. This would allow the mustard allergy sensitive consumer to maintain control and confidence in their dietary choices.

The current proposed approach of informing AAA and ASCIA does not assist these organisations provide helpful advice to sensitive consumers as they have no specifics to guide concerned consumers if they wish to seek advice on what they need to do to avoid exposure. This is likely to result in reduced confidence in the quality of life of individuals with mustard allergy as they will be unable to confidently purchase packaged foods and eat out.

³ At a meeting between AAA and the NSW Food Authority on 20 August 2020

⁴ <https://allergyfacts.org.au/allergy-anaphylaxis/what-is-anaphylaxis>

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.