

Project Officer Application A1175
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

4 September 2020

Dear Sir/Madam

A1175 – Rapeseed protein isolate as a novel food :

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make.

NZFS agrees that the plant metabolites (erucic acid and glucosinolates) and metal contaminants do not pose a safety concern.

However, NZFS believes the potential for allergenicity requires careful assessment and management. This is supported by the documented view of the FSANZ Advisory Committee on Novel Foods (ACNF) who considered rapeseed protein isolate to be a novel food because of the potential for allergenicity due to either rapeseed sensitivity or cross-reactivity in consumers with mustard allergy. NZFS notes that the prevalence of mustard allergy is currently not well understood in the New Zealand/Australian populations, and suggests sensitive consumers should be informed about the new protein ingredient and a watch kept for allergic reactions that may occur following the introduction of rapeseed/canola protein isolates on to the market.

Under the A1175 Call for submissions we note the following from SD1 Section 5.2.3.3 *Human allergenicity data on Brassica species*:

- Allergy to foods derived from the seeds of mustard species is well documented (Sharma et al. 2019) with a cause and effect relationship confirmed in single and double-blind placebo-controlled food challenges (Rancé et al. 2000; Morisset et al. 2003; Figueroa et al. 2005).
- Mustard allergy was reported to be the fourth leading cause of food allergy in France (Rancé et al. 1999).
- The EU and Canada have included mustard as a priority allergen for labelling purposes (CEC 2007; Health Canada 2010).
- Health Canada noted the potential cross-reactivity between mustard and rapeseed, and as a major producer of both crops concluded that mustard should be included in the list of priority allergens.
- EFSA concluded that it is likely that rapeseed protein isolate can trigger allergic reactions.
- FSANZ concluded that rapeseed protein isolate has the potential to induce allergic responses in individuals who are allergic to mustard.

Therefore, NZFS suggests that further consideration of allergen labelling is needed, or steps to alert sensitive consumers of the risks posed by this new food ingredient.

New Zealand Food Safety – Haumaru Kai Aotearoa
Food Science & Risk Assessment Directorate

As noted in the paper, the collective term for *Brassica* species low in erucic acid and glucosinolates is *Canola*, which is the common name in North America and Australasia and can be used in place of the term rapeseed. Therefore, we propose that the variation to Schedules 3 and 25 should include the common name alongside rapeseed protein isolate; for example: *Rapeseed (Canola) protein isolate* or *Rapeseed protein isolate (Canola protein isolate)*.

Yours sincerely



Manager Food Science