



MANILDRA GROUP

Commitment to Excellence

SUBMISSION

PROPOSAL P1031 – ALLERGEN LABELLING EXEMPTIONS [18-15]

September, 2015



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Manildra requests that the information contained in this Submission regarding
cost increases be kept confidential, as discussed.

Prepared on behalf of the Manildra Group of Companies

This submission was prepared and signed by:

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Introduction

Manildra welcomes the opportunity to make this submission in response to Food Standards Australia New Zealand (FSANZ) Proposal P1031 – *Allergen Labelling Exemptions* (“the Proposal”).

Manildra Group is a privately owned agribusiness that converts raw materials such as wheat, sugar, canola and beef into value added goods. We are a significant supplier to the food industry throughout Australia and export throughout the world including North America, Asia, Japan, Middle East and Pacific Islands.

Overall Position

Manildra **supports** the proposal to exempt certain foods and ingredients derived from allergenic foods from mandatory declaration of allergens where available evidence indicates the production methods used remove or reduce allergenic proteins to levels that are of negligible risk to allergic consumers.

Manildra **supports** the proposed exemptions for:

- 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.

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

Manildra requests that FSANZ reconsider the proposed approach for glucose syrup derived from wheat starch and approve a limit of 20ppm.



Glucose Syrup Derived from Wheat

Manildra **does not support** the proposed limit of 10ppm for the following reasons:

- The level proposed will impose significant extra cost, where there is no demonstrated benefit;
- There is a similar level of risk for 10-20mg/kg; and
- This is not consistent with the EU labelling exemption in practice – a region that relies heavily on wheat-based glucose syrup similar to ANZ.

These points are discussed further in the following sections.

Cost Impact

The additional cost of manufacturing, segregation of product between local and exported product and additional testing would amount to between an additional [REDACTED] of the product price.

In a commodity marketplace, this will have a significant impact on our competitiveness.

Manildra would be willing to provide further detail around the cost impact to assist FSANZ.

Level of Risk

As stated in the P1031 proposal the difference in risk to wheat allergic consumers between 10ppm and 20ppm is negligible.

International Consistency

Currently we compete with European glucose manufacturers who export to Asia. These manufacturers comply with CODEX which is < 20ppm. This level is widely accepted throughout Asia.

Alternative Approach

Manildra propose that for glucose syrups from wheat the limit should be set at 20ppm and not 10ppm for the reasons outlined in our submission.

The proposed limit of 10ppm will place our business at a significant disadvantage in the export market with no corresponding increase in food safety.