

23rd September 2015

To whom it may concern

Mondelez Australia supports P1031 "Allergen Labelling Exemptions" in principle but would like to raise a concern regarding the level of gluten in Glucose syrup derived from Wheat Starch. Our "in principle" support is based on providing those with an intolerance to wheat protein and gluten with a wider range of foods that are not required to be labelled as coming from a wheat source but we have significant concerns with the rationale behind the P1031 recommendation.

It is my understanding that the EU (Commission Directive 2005/26/EC) provides an exemption from labelling for Wheat based glucose syrups with no limitations on the gluten. This proposal would mean that we are out of step with existing international legislation. Coeliac's, and those with a Wheat protein intolerance, are no less or more sensitive in the EU than in Australia and New Zealand

As a leading manufacturer of Sugar Confectionery in ANZ we would have been more than happy to provide input into the potential intake of Wheat Glucose Syrup via our Confectionery. Wheat Glucose Syrup comprises a maximum 50% of any of our Sugar Confectionery, with a range of 35-50%. There are technological reasons, relating to the manufacture of these products, why we cannot exceed this level. Even in the centres and inclusions of Chocolate based products the level of glucose syrup would not exceed 30% of the product as consumed.

Based on a maximum 50% Glucose level it would require:

- 75g of Confectionery to provide 1 mg Wheat protein at 20 mg/kg gluten
- 150g of Confectionery to provide 1 mg Wheat protein at 10 mg/kg gluten
- 300g of Confectionery to provide 1 mg Wheat protein at 5 mg/kg gluten

The maximum consumption of Confectionery stated in the Proposal Part 2.1.3) at 75-91grams at a children's party is accommodated by Glucose syrup at 20 mg/kg and at a maximum level of 50% of the product at the lower end of consumption.

However, considering that the Proposal states that the majority of the Wheat Glucose Syrup available in Australia is <10 mg/kg (and as stated in part 2.1.3 95% of samples tested were below the detectable level of 3 mg/kg) the likelihood that consumers would consume confectionery manufactured only with Wheat Glucose syrup at 20 mg/kg is highly unlikely. Also as the 50% Glucose syrup usage is at the maximum level the impact is going to be even lower again.

The additional anomaly is that if we were to manufacture a product that contained 25% glucose syrup at 20 mg/kg gluten it would contain the same level of gluten as a



product made with 50% glucose syrup at 10 mg/kg/gluten – yet in accordance with the recommendation of this proposal we would have to declare that the glucose syrup containing 20 mg/kg gluten was from a Wheat source. Similarly a product made with a blend of Wheat glucose syrup at 20 mg/kg and Corn derived Glucose syrup could contain less gluten than a product made wholly with glucose syrup at 10 mg/kg gluten.

If, as stated in part 2.2.2.3 “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” and as stated in 2.1.3 “Analytical data from Australian produced glucose syrup shows that in 95% of samples tested, gluten levels were below the limit of detection (<3 mg/kg)” why does the proposal seek to set a limit on having to declare Wheat as the source of a glucose syrup at a maximum 10 mg/kg?.

Yours faithfully

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