

21 September 2015

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

Dear Sir/Madam

**Re. Submission –
Proposal P1031: Allergen Labelling Exemptions**

I write on behalf of Coeliac Australia (CA). CA is a national not-for-profit association, comprising five state organisations supporting people with coeliac disease.

CA wishes to make a submission in regard to the Proposal P1031, which proposes a change the standard 1.2.3 to exempt certain foods and ingredients from the mandatory requirement to declare allergens. As an organisation representing those with coeliac disease, our response is specific to the 'Glucose syrup from wheat' and 'Distilled alcohol from wheat' items within the proposal.

CA is unable to support the proposal; we have concerns in two main areas:

1. Consumer food choices

Our primary concern is consumer choice; by exempting wheat derived glucose syrup from the mandate to declare its allergenic source, gluten free consumers will no longer be provided with adequate information to make an informed food choice.

Putting issues of safety and risk aside, consumers do have a right to know what is in their food; the changes proposed in P1031 would likely cause consumer uncertainty and distrust.

2. Residual gluten content less than or equal to 10mg/kg

P1031 proposes that 'glucose syrup made from wheat starch be exempted from mandatory allergen declaration requirements where the residual gluten content is less than or equal to 10mg/kg'. This effectively allows an ingredient that contains detectable levels of gluten to be included in a food product, without any declaration. We believe this contradicts the essence of standard 1.2.7 relating to gluten claims.

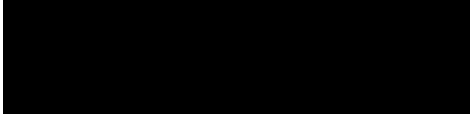
While we acknowledge a 'gluten free' claim may only be made if the final product contains 'no detectable gluten', in the absence of a gluten free claim, consumers will make food choices based on the list of ingredients provided. So in addition to our concerns expressed above in relation to consumer right to information, we are also concerned about the potential for the consumer to be misled.

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As a consumer organisation, we are disappointed that opportunity was not provided prior to this point to provide input to the proposal. However we appreciate the opportunity to make this submission in the interests of those with coeliac disease.

Please don't hesitate to contact me with any queries.

Yours sincerely

A solid black rectangular box used to redact the signature of Tom McLeod.

Tom McLeod
President