



Allergy & Anaphylaxis Australia

11 November 2013

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

To whom it may concern:

On behalf of Allergy & Anaphylaxis Australia I wish to make a submission on **Proposal P274 – Review of minimum age labelling of foods for infants**.

Background

Allergy & Anaphylaxis Australia (A&AA) is a charitable, non-profit organisation established in 1993 to support and assist those affected by allergy and anaphylaxis. A&AA is dedicated to assisting individuals, their caregivers and all in the community in the management of allergic conditions including food allergy. A&AA's aim is to enable individuals and their families to enjoy an optimum quality of life whilst minimising risk to their health and wellbeing.

A&AA strives to raise awareness of allergy in the community and provides evidence-based information, resources and services to support children and adults living with allergic disease. A&AA has members across all states and territories of Australia. We have a Medical Advisory Board that consists of several allergy specialists who are also members of Australia's peak medical body, ASCIA (Australasian Society of Clinical Immunology and Allergy).

Summary

The proposal cannot be reconciled with FSANZ objectives to protect public health and safety insofar as the development of food allergies is concerned. It has the potential to increase the incidence of food allergies in infants and young children by restricting the window of opportunity for the introduction of other foods thereby putting infants and children at potentially higher risk of developing food allergies.

Issues

A&AA does not support the changing of minimum age labelling of foods to 'around 6 months'. ASCIA has infant feeding guidelines which state that complementary foods should be introduced between 4 and 6 months. Whilst ASCIA acknowledges that more research is required, advice given by experts in allergy in Europe, North America and Australia currently is that solid foods are to be commenced between 4 and 6 months. See:

http://www.allergy.org.au/images/stories/aer/infobulletins/2010pdf/ASCIA_Infant_Feeding_Advice_2010.pdf

<http://www.jaci-inpractice.org/article/S2213-2198%2812%2900014-1/fulltext#sec4.1>

http://espghan.med.up.pt/position_papers/Diagnostic_Approach_and_Management_of_Cow_s_Milk.28.pdf

A&AA understands various Australian recommendations regarding minimum age of infant feeding are conflicting and that the proposed FSANZ change is an attempt to be in line with the NH&MRC guidelines. A&AA asserts that the NH&MRC did not have had access to the latest data on food allergies when revising the guidelines, and therefore A&AA does not believe that FSANZ has sufficient evidence to support a change. In a community where there is so much fear around babies and the development of food allergy, changing wording from 'from 4 months' to 'around 6months' will likely mean that most parents do not commence first solids

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until the child was closer to 6 months. This is in conflict with peak medical bodies around the world saying that 'more research is needed but introduction of solids between 4-6 months is advised'.

It is now accepted by international expert bodies that delay in the introduction of common allergens (many contained in solids) does not reduce food allergy. 'Experts around the world, including ASCIA, American Academy of Pediatrics and the European Society for Paediatric Gastroenterology, Hepatology and Nutrition now advise introduction of solids 'from 4 – 6 months'. The wording 'around 6 months' encourages parents to delay until closer to 6 months and is very different to encouraging what allergy specialists are advising which is between 4-6 months. Effectively this proposal is closing a possible window of opportunity – therefore potentially putting children at risk of developing food allergy.

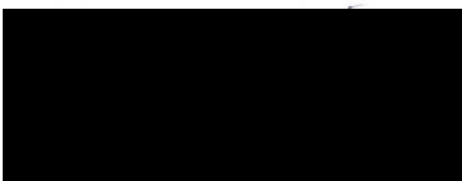
A&AA strongly recommends that FSANZ postpone any further work on this proposal until the release of the next Cochrane Review. It is important that we now wait for updated information before making any changes on this issue that has now been discussed over a 5 year period. It is A&AA's view that there is not enough evidence, to warrant a change in the Food Standards Code at this time. Further published results of research being undertaken should be considered before making any changes. A change to the Food Standards Code at this time would *further confuse the Australian community*; a community that now has 1 in 10 infants aged 12 months developing food allergy; a community that needs legislators to be working with current experts in the field of allergy.

AA&A asserts that its concerns will not be addressed by the inclusion of 'first foods' in the proposal. AA&A notes the proposed restriction in clause 5, applied to all infants foods including first foods, that 'The label on a package of food for infants must not include a recommendation, whether express or implied, that the food is suitable for infants less than around 6 months of age.' Yet under the provisions for first foods there are the labelling requirements 'Around 6 months' and 'Not before 4 months of age'.

Parents/carers would be confronted with conflicting and contradictory advice in the label, may well follow the 'around 6 months' advice which must appear on the front of the label, and may not even see the 'not before 4 months of age' which can now appear anywhere in the label, rather than in conjunction with the 'around 6 months' advice, as was the case previously.

Thank you for acknowledging Allergy & Anaphylaxis Australia's concerns in the review of Minimum age labelling of food for infants – Proposal 274.

Yours sincerely,



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¹ ASCIA Infant Feeding Advice <http://www.allergy.org.au/health-professionals/papers/ascia-infant-feeding-advice>

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