2 September 2024.

Dear FSANZ,

Thank you for the opportunity to provide comments on the Guidelines on the Provision of Food Information for Pre-Packaged Foods to be Offered via E-Commerce.

In response to the request for comment on whether option A or option B in clause 5.1 is preferred, Allergy & Anaphylaxis Australia (A&AA) does not support either Option A or Option B in their current form. We believe that neither provide clear guidance to help consumers. Additionally, we do not believe that using the word ‘encourage’ is strong enough. The provision of the information regarding the packaged food being fit for consumption should not be optional.

**Option A**

**[An indication of durability of pre-packaged food is encouraged to be provided.] [For the purpose of this clause, “durability” means the period between the point of delivery and the best-before or use-by date in which the food retains its specific properties when properly stored.]**

*Which the food retains its specific properties when properly stored*is ambiguous and does not provide clarity on what properties need to be retained. Further detail is required so the recommendation is not open to interpretation.

**Option B**

**It is encouraged that an indication of the minimum number of days the product will be delivered to the final consumer before the “Use-by Date”, “Expiration Date”, “Best-Before Date” or “Best Quality Before Date” be provided’**

Option B does not consider durability and the state the food is in when it arrives to the consumer.

Option C to remove the ‘indication of durability’ clause and definition entirely could be an issue for countries that do not have legal requirements protecting consumers from products being sold beyond the ‘best-before’ or ‘use-by’ dates.

We are unclear why the term durability must be used and suggest the following text:

**The pre-packaged food is delivered in a state that is safe for consumption and before the best-before or use-by date.**

Given that we do not support either Option A or Option B in their current form we don’t believe the text is ready for advancement to Step 8.

We are happy to discuss if you have further questions or our comments are unclear.

Kind regards,  
  
*Sally*  
  
Sally Voukelatos  
**Allergy Educator | Allergy & Anaphylaxis Australia**