



Allergy & Anaphylaxis Australia

2 March 2021

Request for comments / information on allergen labelling: revision of the General Standard for the Labelling of Pre-packaged Foods (CXS 1 1985) (For further information please see CL 2021/9/OCS-FL)

CONSULTATION QUESTIONS

Question 1

Does the scope of the GSLPF need clarifying as it applies to 'food for catering purposes' for the purpose of declaring foods and ingredients known to cause hypersensitivity (see Section 1.1 of Appendix I)? Please provide reasons for your response.

If yes, then how should the scope of the GSLPF as it applies to 'food for catering purposes' be clarified for the purpose of declaring foods and ingredients known to cause hypersensitivity?

Allergen labelling must extend to foods prepared for catering purposes, non-retail packaging and online products. With ready made wrapped foods, such as sandwiches, the preference is for allergen information to be included on the wrapping of the product and not on shelf.

We support the provision of allergen information to non-prepackaged foods as allergen declarations could be provided in a manner other than the label (verbally, online).

Question 2

Do you agree with including specific provisions for the presentation of declarations of foods and ingredients known to cause hypersensitivity in Section 8 (Presentation of mandatory information) in the GSLPF (see Sections 1.2 and 4 in Appendix I)? Please provide reasons for your response.

We agree with including specific provisions for the declaration of foods and ingredients known to cause allergic reactions. The provisions could include bold font, minimum size font and an allergen summary statement (using the word 'contains') in addition to an ingredient list.

Allergen information should be grouped together to be easily identified and not hidden amongst other labelling information.

Question 3

Do you agree with including definitions for 'hypersensitivity', 'allergen', 'food allergy' and 'food intolerance' in the GSLPF (see Section 2.2 of Appendix I)? Please provide reasons for your response.

If yes, then please provide comments on these proposed definitions.

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As outlined in our last submission, A&AA do not support the definition of 'hypersensitivity' as it is too broad. We recognise in the footnote for Coeliac disease there is reference to the serious health consequences, but this is not the case in the proposed definition for food allergy. It should be stated in the definition of food allergy that only a small amount of allergen can trigger a potentially life threatening reaction (anaphylaxis) in some individuals.

It is important to recognise that Coeliac disease and the threshold levels that have been created around 'gluten free' products would not apply to individuals who have an IgE mediated food allergy to wheat. Those with wheat allergy may react to doses of wheat that are insignificant for those with Coeliac disease.

With regard to the definition of Coeliac Disease, we prefer: Coeliac Disease is a serious lifelong illness where the immune system reacts abnormally to gluten causing small bowel damage. This effects nutrient absorption, which can lead to gastrointestinal and malabsorptive symptoms. Symptoms can also be caused by chronic inflammation in other parts of the body.

We suggest the definition of allergen to be: 'An allergen is an otherwise harmless substance, capable of triggering an immune response that manifests as an allergic reaction, including anaphylaxis in some individuals. In the case of food, it is usually, but not always a protein found in food that triggers the response in sensitised individuals.

It is important to be clear that it is usually, but not always protein, as we highlighted previously that in Mammalian Meat Allergy the trigger is a carbohydrate (alpha-galactose).

Suggested definition of food allergy: A food allergy is an adverse health effect resulting from a specific immune response that occurs reproducibly on exposure to a food. The immune response may be either IgE or non IgE mediated. Food induced anaphylaxis is a serious IgE mediated allergic reaction that is rapid in onset and may cause death.

Suggested definition for food intolerance: Food intolerance does not cause life threatening reactions and often reactions are dose related, in that small amounts are often tolerated. Signs and symptoms of a food intolerance can occur many hours after ingestion.

Question 4

Do you agree with amending section 4.2.1.3 of the GSLPF so that the declaration of foods and ingredients in section 4.2.1.4 apply to all compound ingredients including those that constitute less than 5% of the food (see Section 3.1 of Appendix I)? Please provide reasons for your response.

Yes, it is important that the declaration of foods and ingredients in section 4.2.1.4 is applied, even if they constitute less than 5% of the food due to the very small amounts of allergen required to elicit an allergic reaction in some individuals.

We would argue that all ingredients, regardless of quantity be required to be listed. Although the majority of allergic reactions occur to common allergens, there is a significant number of individuals who are allergic to more unusual ingredients such as fruit and spices that do not need to be listed when they are present at less than 5% of the total proportion of the ingredients. Eating any packaged food poses a significant danger to these individuals unless they have enquired with the manufacturer about allergen content. Even if the consumer has enquired, the manufacturer is under no obligation to reveal the

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ingredients of their product.

Question 5

Do you agree with specifying the use of common and well understood terms (words) for the source of the food and ingredient known to cause hypersensitivity as part of, or in conjunction with, the relevant ingredient name when declarations are made on prepackaged foods (see Section 3.2 of Appendix I)? Please provide reasons for your response.

Yes, it is important that common and well understood terms are used for food and ingredients known to cause allergic reactions as it can be difficult to determine whether a food is suitable/not suitable if the ingredients are not listed in familiar terminology/technical language eg sodium caseinate, whey protein.

Consumers with allergy and their carers as well as food service staff need clear and consistent information on food packaging and in labelling in order to make an informed choice about the suitability of a food product.

Question 6

Do you agree that section 4.2.2 of the GSLPF requires no change in relation to allergen labelling (see Section 3.3 of Appendix I)?

Yes, we agree that the presence in any food or food ingredients obtained through biotechnology of an allergen transferred from any of the products listed in Section 4.2.1.4 shall be declared and when it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed.

It would be worthwhile to consider the need to expand beyond biotechnology to the production of foods from other novel technologies that contain a major allergen as these too are a risk for those with a food allergy.

Question 7

Do you agree with the proposal to amend to section 4.2.3.1 in relation to the ingredients listed in section 4.2.1.4 and class names (See Section 3.4 of Appendix I)? Please provide reasons for your response.

Yes, it is important to use class names to ensure the source of an ingredient known to cause food allergy can be clearly identified.

The contains statement could be used to identify the presence of a class of allergen, while the specific allergenic ingredient could be listed in the ingredient list.

Question 8

Do you agree with the proposal to amend section 4.2.4.2 to clarify the exemption applying to processing aids and the carry-over of food additives (see Section 3.5 of Appendix I)?

Yes, we agree that the exemption should not apply to food additives and processing aids that contain or are derived from the foods and ingredients in section 4.2.1.4

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Question 9

Do you agree with the proposal to remove the exemption from declaring foods and ingredients listed in section 4.2.1.4 as it currently applies to small units (see Section 3.6 of Appendix I)?

Yes, we agree that the exemption should not apply to section 4.2.1.4 given the health risk associated with foods and ingredients known to cause food allergy is the same regardless of the surface area of the package containing a food. If the surface area did not permit a detailed ingredient list, an allergen summary statement would be acceptable. E.g. Contains (list major allergens).

Question 10

Do you have any other comments about the proposed approach or proposed revisions in Appendix II?

We would like to reinforce that we do not support the proposed definition of hypersensitivity and feel strongly that it needs to delineate between food allergy, Coeliac Disease and food intolerance. The consequences of an exposure to food allergen for those with food allergy needs to be clearly outlined as it has already been done for Coeliac Disease. The term hypersensitivity which is used to collectively speak to three very different food health needs dilutes the importance and severity of some conditions over others. People already think those with food allergy are "sensitive" and use of this term to encompass a potentially life-threatening condition does not assist us in communicating each dietary issue separately.

Thank you for the opportunity to comment on the way forward with food allergen labelling. Please do not hesitate to contact me with any queries.

Kind regards,

Maria Said

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