



Allergy & Anaphylaxis Australia[®]

Email: jenny.hazelton@foodstandards.gov.au

4 September 2023

Dear Jenny,

RE: PROPOSED DRAFT REVISION OF THE *GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXs 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING (FOR ADOPTION AT STEP 5)*

Allergy & Anaphylaxis Australia (A&AA) does not support the proposed Draft Revision on the General Standard for the Labelling of Pre-Packaged Foods (CXs 1-1985): Provisions relevant to Allergen Labelling for adoption at Step 5.

A&AA has several concerns that we needed to have addressed before we can support the document.

1. 4.2.1.4 Foods and Ingredients and Specified Name

Cereals containing gluten is listed with the specified names to be used: wheat, rye and barley. This does not make it clear that wheat containing cereals that do not contain gluten, but contain other wheat proteins or wheat starch, may not be suitable for people with wheat allergy. A&AA would prefer to see "cereals containing gluten" removed from the top of the listing of "Foods and Ingredients" and appear as 'other cereals containing gluten' below wheat, rye and barley and above "products thereof."

The following links support the advice for people with wheat allergy to check for all wheat ingredients on a food label even if a product is labelled gluten free.

<https://foodallergyeducation.org.au/food-labels>

<https://www.bda.uk.com/resource/wheat-free-diet.html>

A&AA is confused about whether mollusc is classified under 'crustacea and products' or 'fish and products.' A&AA would prefer for mollusc to appear as a separate entity. Some people with fish or crustacea allergy can eat molluscs so grouping them together may mean that they are unnecessarily avoided.

2. 4.2.1.6 "Subject to evaluation using established criteria, national authorities may exempt ingredients derived from foods listed in section 4.2.1.4 and where applicable 4.2.1.5 from being declared."

A&AA is not clear under what circumstances food ingredients derived from foods listed in section 4.2.1.4 and where applicable 4.2.1.5 would be exempt. A&AA notes that Food Standards Australia New Zealand (FSANZ) has the following exemptions:

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- glucose syrups made from wheat starch (exempt from declaring wheat)
- fully refined soybean oil (exempt from declaring soy)
- the soy derivatives tocopherols and phytosterols (exempt from declaring soy)
- distilled alcohol from wheat or whey (exempt from declaring wheat or milk)

It does state under 4.2.1.4 that the foods and ingredients shall always be declared. This appears contradictory to 4.2.1.6. A&AA believes that any exemptions need to be evidence based and be supported by the scientific committee of experts on food allergy.

3. 4.2.3.1 "Unless a general class name would be more informative, the following class names may be used."

A&AA is unclear what this means. It says the following class names, but they are not listed. There only appears to be references to "Foods and Ingredients" and "Specified Name". A&AA believes that specified names are more helpful to consumers. For example, most people are not allergic to all tree nuts so if the individual tree nut is not listed, some tree nuts may be unnecessarily avoided.

4. 8.3.2 Bis "Food and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or in a separate statement..."

A&AA believes that the food and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 MUST be declared in the list of ingredients and recommend that they also appear in a separate statement, outlined in 8.3.2.1 to commence with the word 'Contains' (or equivalent word).

A&AA found the information under 8.3.2 to be confusing. 8.3.2 states the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 may be declared in a separate statement directly under the list of ingredients, but as outlined in 8.3.2 Bis there are options on the mandatory allergens being in the list of ingredients or in a separate statement or both.

A&AA supports the Plain English Allergen Labelling (PEAL) requirements that FSANZ has progressed and that are to become mandatory in February 2024 and would like to see these requirements adopted by Codex in the General Standard for the Labelling of Pre-Packaged Foods.

Yours sincerely,

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