



Allergy & Anaphylaxis Australia[®]

Email: jenny.hazelton@foodstandards.gov.au

4 September 2023

Dear Jenny,

RE: PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING (FOR ADOPTION AT STEP 5)

Allergy & Anaphylaxis Australia (A&AA) supports the proposed Draft Guidelines on the Use of Technology to provide Food Information in Food Labelling for adoption at Step 5.

However, we did have two issues that we feel need to be considered:

1. The definition of consumer.

In the Purpose statement it states, "Provide guidance on the use of technology to provide information to consumers." 'Consumers' is defined by *General Standard for Labelling of Pre-packaged Foods (CXS 1-1985)* as "persons and families purchasing and receiving food in order to meet their personal needs." This definition does not take into account a third party, such as a food service provider, who may also use technology to access food information. The information obtained through technology about a food used in their food production is important in order for them to meet their obligations to consumers, especially around the disclosure of food allergens. A&AA believes guidance on the use of technology to provide information also needs to be provided to others such as food service providers.

2. 5.2 The name of the food and food information concerning health and safety should not be provided exclusively using technology.

A&AA is concerned that all people working in food importing, distribution and manufacturing may not understand the implied meaning of "food and food information concerning health and safety". We believe that this needs to be clearly defined for the culturally and linguistically diverse (CALD) population that work in food distribution/import/manufacturing. A&AA would prefer that it be stated that 'the name of the food and food information shall be shown in accordance with the Codex mandatory requirements.' However, we note that this is largely communicated in 7.4, "Where food information is provided using technology, the food information shall be shown in accordance with applicable Codex texts."

Yours sincerely, Maria Said AM

Chief Executive Officer

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