



10 February 2015

Food Standards Australia New Zealand  
By email [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Dear Food Standards Australia New Zealand

**Re: Submission to Food Standards Australia New Zealand - Proposal P1016 - Hydrocyanic acid in Apricot Kernels & other Foods**

CHOICE appreciates the opportunity to provide the following comments to Food Standards Australia New Zealand (FSANZ) on Proposal P1016 - Hydrocyanic acid in Apricot Kernels & other Foods.

CHOICE advocates for a food regulatory system that protects consumers' health and safety. In this instance, we welcome FSANZ's regulatory approach and strongly support the prohibition of the sale of unhulled and hulled raw apricot kernels under Standard 1.4.4 with exemptions for apricot kernel-derived foods that are safe for consumption (option 5 in the proposal). This position has been taken because of the public health risk posed by the sale of apricot kernels, particularly to vulnerable consumers.

**The sale of apricot kernels poses a public health risk and should be banned**

There is a large body of evidence highlighting the safety risk of consuming raw apricot kernels, both with and without skin. Raw apricot kernels contain cyanogenic glycosides which cause poisoning and death when eaten raw and in sufficient amounts. The number of cases of poisoning and fatalities due to apricot seed ingestion across the world confirms its very real health risks.<sup>1</sup>

FSANZ's risk assessment clearly demonstrates the difficulty of providing guidance about how many apricot kernels are safe to eat. The levels of hydrocyanic acid (HCN) in kernels vary widely.<sup>2</sup> Given this variation, it is extremely difficult for the average consumer to

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<sup>1</sup> Lasch, E. & Shawa, R. 1981, Multiple Cases of Cyanide Poisoning by Apricot Kernels in Children from Gaza, *Pediatrics*, Vol 68, No 1

Rubino, M. & Davidoff, F. 1979, Cyanide Poisoning from Apricot Seeds, *JAMA*, Vol 241, No. 4

Sahin, S. 2011, Cyanide Poisoning in a Children Caused by Apricot Seeds, *Journal of Health and Medical Informatics*, 2:106

<sup>2</sup> HCN in raw apricot kernels with skin ranged from 1,240-2,820 mg HCN/kg; whereas, those without skin ranged from 49 to 440 mg HCN/kg.

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determine a “safe” amount of kernels to eat. This makes regulatory options 1-4 unviable (doing nothing, providing information to consumers or a partial sales ban).

### **Vulnerable consumers are the most affected by current arrangements**

This issue has heightened importance as apricot kernels are promoted and sold as an alternative treatment for cancer. It is claimed that a chemical in apricot kernels, amygdalin (also known in a modified form as laetrile), cures or restricts the growth of cancer cells while being less or non-toxic to normal cells.<sup>3</sup> This practice continues today, with many websites and individuals advocating its use as a cancer prevention and treatment.<sup>4</sup>

Studies dating back to the 1950s have failed to find any benefits of consuming amygdalin and curing cancer in humans.<sup>5</sup> A systematic review of laetrile as a treatment of any type of cancer found there was no evidence that proved its effectiveness.<sup>6</sup> Because of this lack of evidence, laetrile is not authorised for sale in the European Union and has been banned by the Food and Drugs Agency in the USA.<sup>7</sup>

CHOICE has found that it is not difficult to source apricot kernels in Australia. Preliminary inquiries found apricot kernels sold at health food stores in Sydney and in a number of online stores, many promoting the benefits of kernel consumption for cancer patients.

We note that a number of websites which previously made claims about the benefits of apricot kernel consumption as a cancer cure have amended their language or removed claims due to intervention from regulators.<sup>8</sup> However, these sites appear to still be encouraging the consumption of kernels. For example, apricotseeds.com.au notes that it has removed large parts of its website but still sells apricot kernels online while linking to websites hosted outside of Australia with information about how apricot kernels “stop the spread of cancer.”<sup>9</sup> Other stores are still making claims about apricot kernels ability to

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<sup>3</sup> American Cancer Society, 2012. *Laetrile*, accessed on 28 Jan 2015, <<http://www.cancer.org/treatment/treatmentsandsideeffects/complementaryandalternativemedicine/pharmacologicalandbiologicaltreatment/laetrile>>

<sup>4</sup> Apricot Seeds Australia; <<http://apricotseeds.com.au/stop-cancer-spreading.html>>, Apricot Kernels Kill Cancer Cells; <<https://www.youtube.com/watch?v=Qi4xXdBxDSs>>

<sup>5</sup> Cancer Council Australia, 2013, *Can eating apricot kernels cure cancer?*, accessed on 28 Jan 2015, <<http://iheard.com.au/question/eating-apricot-kernels-cure/>>

<sup>6</sup> Milazzo, S. Ernst, E. & Lejeune, S. 2007, Laetrile for cancer: a systematic review of the clinical evidence, *Support Care Cancer*, Vol 15, Issue 6

<sup>7</sup> Cancer Research UK, 2013, *Laetrile (amygdalin, vitamin B17)*, accessed on 28 Jan 2015, <<http://www.cancerresearchuk.org/about-cancer/cancers-in-general/treatment/complementary-alternative/therapies/laetrile>>

<sup>8</sup> See [www.apricotseeds.com.au/letter\\_from\\_NSW\\_health.pdf](http://www.apricotseeds.com.au/letter_from_NSW_health.pdf)

<sup>9</sup> [http://apricotseeds.in/stop\\_cancer\\_spreading.html](http://apricotseeds.in/stop_cancer_spreading.html), accessed 8 February from <http://apricotseeds.com.au/buy-apricot-seeds.html>

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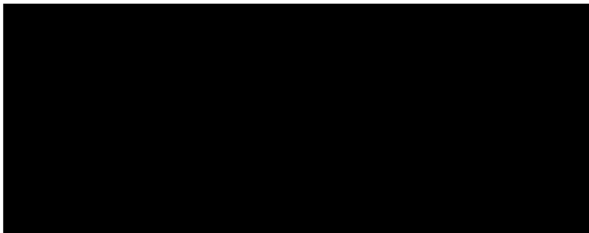
cure cancer. Oznatureshop.com.au sells kernels alongside of books and DVDs with labels of “World without cancer. Laetrile: God’s Natural Cancer Killer”.<sup>10</sup>

Businesses selling apricot kernels are taking advantage of people who are sick and looking for hope. A ban is needed to prevent businesses profiting from the spread of misinformation and the sale of a dangerous good.

The evidence shows that consumption of apricot seeds is dangerous and can result in poisoning or even fatalities. Given the absence of any proven health benefits of apricot kernel consumption and wide variation in HCN levels, CHOICE agrees with FSANZ’s conclusion that banning the sale of all kernels is likely to have the greatest net benefit for consumers.

For further information, please contact CHOICE 

Yours sincerely,



Policy & Campaigns Advisor

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<sup>10</sup> [www.Oznatureshop.com.au](http://www.Oznatureshop.com.au), accessed 8 February 2015

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