



NEW ZEALAND STARCH LTD

SUBMISSION

To FSANZ

PROPOSAL P1031

"ALLERGEN LABELLING EXEMPTIONS"

NEW ZEALAND STARCH LTD CONTACTS FOR THIS SUBMISSION:

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[REDACTED]



NEW ZEALAND  
STARCH

**Glucose syrup derived from wheat**

New Zealand Starch Management team was not made aware of the proposed changes to the allergen declaration in discussion with respect to wheat glucose being labeled as 'gluten-free' in FSANZ Proposal P1031 hence we request you accept this late submission.

While appreciating and understanding that submission closing date for this review has passed we feel that published submissions present different information to that published by FSANZ in "SD1 Risk Assessment". We, however, believe that as a manufacturer of corn-based glucose syrup in New Zealand for the New Zealand and Australian market we should have been contact directly by FSANZ rather than relying on media publications.

New Zealand Starch Ltd is a commercial manufacturer of gluten-free glucose syrups & starches, under the current standard, and is the predominant supplier in the New Zealand market and has substantial sales of glucose syrup & starch into Australia.

We note that the original risk assessment published by FSANZ focused on the Australian market for glucose syrups from wheat.

We wish to make you aware that New Zealand Starch Ltd manufacture glucose syrups in New Zealand meeting the current detection limit of less than 3mg/kg using the R5 ELISA methodology.

By your conclusion, levels below the detection limit would represent 'No Risk' to wheat allergic individuals. Conversely the proposal for wheat-derived glucose syrup with gluten content of 10-20mg/kg is likely to present 'negligible risk' to the majority of wheat allergic individuals. Based on this conclusion it would seem that some individuals would be at risk and are therefore should be considered important. Would this conclusion now apply to all other products?

Products containing wheat gluten, or residues thereof, that are labeled as 'gluten-free' would only cause confusion – consumers must be allowed to decide whether they are prepared to accept 'negligible risk' by having the wheat source declared on the packaging. Likewise there is 'gluten-free' glucose manufactured to the lower detection limit (3mg/kg) and the proposed change would increase the risk to consumers when there is a viable product already available?

We support the application of a consistent level of detection for all products and therefore would not support relaxation of the currently accepted and workable standards in Australasia.

Conclusion from Supporting Document 1 – "Risk Assessment" s3.9 p27

"Based on the available clinical evidence and likely single meal consumption, wheat-derived glucose syrup with a gluten content of 10–20 mg/kg is likely to present a negligible risk to the majority of wheat allergic individuals. However, to ensure that gluten levels in glucose syrup are as low as technically achievable, the FAISAG has recommended that manufacturers of glucose syrup from wheat starch should be encouraged to prepare syrups with the lowest possible gluten levels. Since the main glucose syrup provider has advised that using the same filtration system as that currently in use in Europe 95% of their syrups have gluten levels under 5 mg/kg and 100% are under 10 mg/kg using the R5 ELISA assay system, a gluten limit of  $\leq 10$  mg/kg for quality assurance purposes should be considered."