

11 January 2016

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
AUSTRALIA

**Re. Submission –
Consultation Paper – W1070: Plain English Allergen Labelling**

Dear Sir/Madam

I write on behalf of Coeliac Australia (CA). CA is a national not-for-profit association, comprising five state organisations supporting people with coeliac disease.

CA wishes to make a submission in regard to consultation paper – W1070, which invites comment to inform a review of allergen labelling. We have provided feedback on the questions posed in relation to section 2.2 *Cereal declarations* and 2.4 *General issues associated with terminology*.

We acknowledge the requirement of standard 1.2.3 that 'cereals containing gluten, namely, wheat, rye, barley, oats and spelt and their hybridised strains' be declared when present in foods, and appreciate that this allows coeliac consumers to make more confident and informed food choices. However, there continues to be some confusion amongst manufacturers (in relation to labelling requirements) and consumers (in relation to label interpretation). We appreciate the opportunity to contribute to this discussion and hope that we may be able to assist resolve some of this ongoing confusion.

2.2.3 Questions for submitters

4. Are manufacturers regularly declaring 'gluten containing cereals' in a 'contains' statement, with the specific cereal/s declared in the ingredient list? Is this information helpful for consumers with a cereal-specific allergy, or does it create difficulties for them in making correct food choices?

There are some manufacturers who declare 'gluten' or 'gluten containing cereals' in a contains statement, with the specific cereal declared in the ingredient list. Not all manufacturers make use of summary statements, as suggested by the AFGC guide, and in some cases a 'contains' statement is used in the absence of any declaration in the ingredient list.

There are certain wheat derived ingredients that Coeliac Australia considers safe for those with coeliac disease e.g. 'glucose syrup (wheat)'. Coeliac Australia educates its members that if 'glucose syrup (wheat)' is the only wheat/gluten derived ingredient listed when a product uses a summary statement (referencing wheat or gluten), then the product is still suitable for those with coeliac disease. To prevent unnecessary avoidance of such 'safe' products, those with coeliac

disease rely on manufacturers identifying which ingredient/s is derived from wheat (or another gluten containing grain).

The ability of the coeliac consumer to interpret the use of a summary statement in this way does rely on their level of understanding of gluten related labelling. This is one of the more complicated aspects of labelling that coeliac consumers are required to learn; it is open to misinterpretation, often resulting in over-restriction.

We recognise the usefulness of summary statements for other allergic consumers where there are no 'exceptions' (like glucose syrup (wheat)).

5. Are there instances where food labels omit the mandatory declaration for 'cereals containing gluten' because the cereal ingredient happens to contain no detectable gluten?

Not to our knowledge.

6. Are there instances where manufacturers are declaring the presence of 'gluten' (not 'gluten containing cereals') along with a declaration of the specific cereal elsewhere on the label? If so, then can you comment on why this labelling practice is occurring, and whether it is/is not useful information for consumers with a cereal allergy?

We are aware of the use of the terminology 'gluten' and 'gluten containing cereals' and 'wheat' in summary statements, with the specific cereal listed in the ingredient list.

The intricacies of the terminology used i.e. 'gluten' or 'gluten containing cereals', is lost on most consumers. Our advice to consumers regarding the interpretation of labels when a summary statement is used is described above and relies on the declaration of the specific cereal in the ingredient list. Of more concern to Coeliac Australia is the use of a summary statement that refers to gluten or wheat, without any declaration of the source of the gluten in the ingredient list.

7. Are you aware of food products that declare the name of a cereal on their labels but also declare that they are 'gluten free'? Would such information be unclear to consumers with a cereal-specific allergy, and if so, how?

Yes, we are aware of a number of products that make a 'gluten free' claim when a gluten derived ingredient is present. We educate our members that it is possible for a product to test to contain 'no detectable gluten' (and therefore be gluten free), despite the presence of a gluten containing ingredient.

2.4.1 Questions for submitters

11. Is the use of unfamiliar or unrecognisable terminology for allergen declarations common practice, and/or creating difficulties with the identification of allergens in foods? We would appreciate any evidence or examples of such labelling practices.

Not to our knowledge in relation to gluten derived grains.

12. Do 'contains' statements assist with identifying the presence of an allergen especially in the context of less familiar or less recognisable terminology being used in allergen declarations?

For those with coeliac disease, 'contains' statements do not always make food choices easier. The use of contains statements can both help and hinder those with coeliac disease, depending on how they are used and the consumer level of understanding and their ability to interpret labels.

As mentioned above, some wheat derived ingredients are safe for those with coeliac disease... this makes the interpretation of labels more complex when summary statements are used.

If we may, we would like to take this opportunity to encourage FSANZ to consider including advisory allergen labelling (both summary ('contains') statements and cross contact statements i.e. 'may contain' statements) in the code. The recommendations relating to use of such statements is currently only voluntary; Coeliac Australia believes the mandatory and more regulated use of such statements would encourage consistency and therefore make them more useful, reliable and meaningful for consumers.

We thank you for the opportunity to provide a comment for consideration in the process. We would be happy to assist further if needed.

Please don't hesitate to contact me with any queries.

Yours sincerely

A black rectangular box redacting the signature of the Technical Officer.

Technical Officer
Coeliac Australia