

1 September 2020

Food Standards Australia New Zealand  
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To whom it may concern,

**RE: Submission on A1175 – Rapeseed protein isolate as a novel food**

The National Allergy Strategy wishes to respond to 'the potential allergic responses to individuals who are allergic to mustard' as identified from the Risk Assessment Conclusions.

The risk management approach proposed by FSANZ relies heavily on ASCIA and allergy consumer organisations to communicate information. However, while these organisations while have good outreach to consumers with food allergy (particularly Allergy & Anaphylaxis Australia and Allergy New Zealand as the consumer organisations), the will not be able to reach all consumers with food allergy and therefore, additional consumer communication strategies must be considered.

With regards to cross-reactivity, while the ASCIA website does not discuss mustard allergy specifically, ASCIA does state that 'almost any food can cause an allergic reaction'. In addition, the Allergy & Anaphylaxis website notes mustard as a potential food allergen. Any food allergen causing an allergic reaction has the potential to cause anaphylaxis.

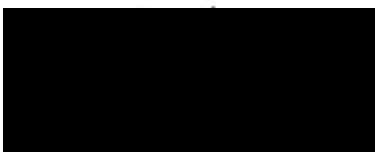
It appears that this application introduces a potential new allergen, irrespective of cross reactivity to mustard (ref. SD1 at 5.3). Given the list of foods that are likely to include the rapeseed isolate, it is likely that consumers may be consuming relatively large amounts given that it will be used in a wide range of staple foods.

The National Allergy Strategy recommends the following:

- FSANZ consultation with the allergy expert working group and the Food Allergy and Intolerance Scientific Advisory Group.
- Provision of evidence that introducing rapeseed isolate at the levels mentioned will not increase food allergen prevalence and events in Australia.
- Further consideration to a broader consumer communication strategy regarding the use of rapeseed protein isolate should it be approved for use in Australia.

Thank you for the opportunity to provide comment. Please feel welcome to contact me should you require information.

Kind regards,



Manager