



28 July 2016

Food Standards Australia New Zealand
Boeing House
55 Blackall Street
BARTON ACT 2600

Attention: Standards Management Officer

Call for submissions – Proposal P1026
Lupin as an Allergen

This is to comment on the Call for submissions for Proposal P1026 – Lupin as an Allergen.

The Food & Beverage Importers Association (“FBIA”) is an industry association that represents importers into Australia of food and beverages, both retail ready and ingredients for further processing. Members range from large, multi-national companies to small, specialist importers. Their imports include a wide range of commodities (eg cheese, nuts, vegetables, fruit, seafood, confectionery, oils) and in a range of formats (frozen, fresh, roasted, prepared, and canned).

In order to manage the risk of consumption of lupin and lupin products, FSANZ has considered a range of non-regulatory and regulatory options during its assessment under section 59 of the FSANZ Act.

The FBIA supports Option 3 - *Prepare a draft variation so that a mandatory allergen declaration would be required on the label, or, where a label is not required, businesses would have to provide access to information about the presence of lupin in food being sold.*

Food & Beverage Importers Association

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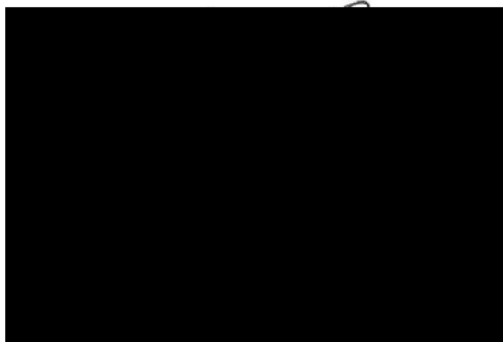
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The Association does not, however, support the proposal for a 12-month transition period and requests consideration of 18 months' transition to allow adequate time for information to be collected and labels to be updated.

The only international regulatory body that has made the declaration of the presence of lupin mandatory is the European Commission. FSANZ did not find any specific regulatory standards in other countries regarding requirements to label lupin or lupin-derived products on food labels as mandatory allergens. Accordingly, it is considered that the customary 12 months' transition period is not adequate for allowing for the relabelling of products containing lupin from other countries.

Should you have any questions on the above, please do not hesitate to contact me.

Yours faithfully,



Secretary