



**Grains &
Legumes
Nutrition
Council**

Cultivating Good Health

Grains & Legumes Nutrition Council

Submission

Proposal 1026 – Lupin as an Allergen

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This submission has been prepared by Grains & Legumes Nutrition Council™ (GLNC), the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- Bakers Delight
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia
- Australian Breakfast Cereal Manufacturers Forum

The Grains & Legumes Nutrition Council (GLNC) appreciates the opportunity to respond to the Proposal 1026 – Lupin as an Allergen.

GLNC supports Option 3, preparation of a draft variation to the Food Standards Code. However, GLNC believes 12 months is an inadequate timeframe for transition.

Education about the level of risk of lupin as an allergen is required regardless of how lupin is labelled. However, inclusion of lupin as an allergen in the Food Standards Code would allow clear communication about lupin as an allergen and potential level of risk while reassuring consumers they have adequate information available on pack to make informed decisions.

GLNC believes there is currently minimal incentive for manufacturers to label foods with lupin as there is little consumer understanding of the health benefits of lupin. For the same reason, the incentive to participate in a voluntary Code would be small. Therefore GLNC supports the inclusion of lupin to the list of allergens in the Food Standards Code section 1.2.3—4 as this would require manufacturers to label lupin in foods.

GLNC acknowledges that the Product Identification Forms have required the inclusion of lupin for some time. However, manufacturers would require additional time to gather information on potential cross contamination to ensure they were fully compliant. Therefore, an 18-month timeframe for transition would be more appropriate.