

23 September 2015

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

Attention: Standards Management Officer

**Proposal P1031 – Call for Submissions
Allergen Labelling Exemptions**

The Food & Beverage Importers Association (“FBIA”) welcomes the opportunity to respond to the Call for Submissions for Proposal P1031 – **Allergen Labelling Exemptions**. By way of background, the FBIA is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.

FSANZ, together with a working group from the Australian Food and Grocery Council’s Allergen Bureau, had identified four products for consideration for exemption from mandatory labelling requirements for allergens:

- soybean oil that has undergone a complete refining treatment
- tocopherols and phytosterols derived from the deodoriser distillate of fully refined soybean oil
- glucose syrup derived from wheat starch
- alcohol distillate made from wheat or whey.

FSANZ has conducted a risk assessment and concluded that:

- soybean oil that has been fully refined presents negligible risk to soybean allergic consumers.

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- Tocopherols and phytosterols are removed in the last stage of refining of soybean oil and therefore also present negligible risk.
- Alcohol distilled from wheat or whey presents negligible risk to susceptible individuals.
- wheat-derived glucose syrup that has been processed so that it contains equal to or no more than 10 mg gluten/kg glucose syrup is considered safe for consumption by sensitive wheat allergic individuals.

FSANZ is now proposing variations to the Food Standards Code to allow for exemptions to allergen declarations consistent with these risk assessments.

We are supportive of the risk assessments and resulting risk management recommendations for three out of the four products, namely:

- Fully refined soybean oil
- Tocopherols and phytosterols from soybean oil
- Distilled alcohol from wheat or whey

These three proposed exemptions are evidence based and consistent with international standards, such as those of the European Union. Accordingly, these exemptions would not impose additional regulatory requirements or compliance costs on imported products that comply with the EU standard.

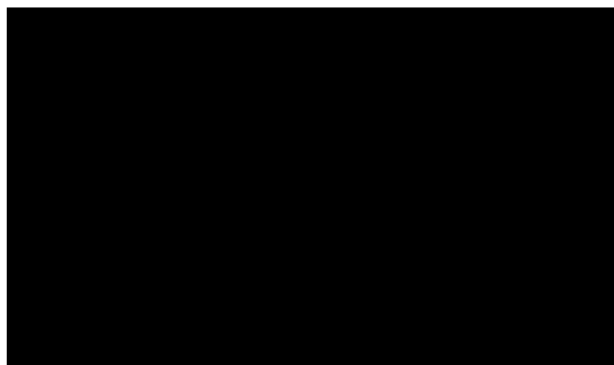
As to the fourth product, while we support an exemption from allergen declaration labelling for glucose syrup from wheat starch, we do not agree with the proposed condition that the residual gluten content be less than or equal to 10 mg/kg. This proposal does not give sufficient weight to the role of good manufacturing practice, as described in the Call for Submission, and is not consistent with generally accepted international exemption level of 20 mg/kg.

The proposed level of 10 mg/kg has the potential to impose additional costs and compliance requirements for Australian and New Zealand companies, both manufacturers and importers, where there is not a demonstrable consumer food safety benefit. We request that the 10 mg/kg gluten level be reconsidered.



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

Yours faithfully,



Secretary