



australasian society of clinical immunology and allergy

27<sup>th</sup> February 2020

ASCIA Submission to Food Standards Australia New Zealand (FSANZ)

Proposal P1044 - Plain English Allergen Labelling (PEAL)

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## SUBMISSION

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### **ASCIA supports the implementation of FSANZ Option 3:**

“Declare allergens using mandatory specified terms in bold font, with additional requirements to declare in the statement of ingredients as well as in a separate allergen summary statement.”

#### **The following are ASCIA’s answers to the questions from FSANZ:**

**1. What proportion of foods are likely to be affected by the change?**

Most foods are likely to be affected by the change, as they contain common food allergens.

**2. Is there likely to be a material difference in costs between Options 2 and 3? If yes, why?**

Yes, but there will be significant benefits due to the additional information required for Option 3.

**3. Is there likely to be a material difference in the benefit to consumers between Options 2 and 3? Yes, as the addition of a separate allergen summary statement will make it easier for consumers to identify allergens in the food, particularly consumers with low literacy levels. Educational resources for consumers should include the need to check both the ingredients list and the allergen summary statement.**

**4. Is Option 2 or 3 sufficient for consumers to make quick and reliable assessments of foods?**

Option 3 is preferred as it provides a quick reference for consumers, and allows cross checking of ingredients by manufacturers to ensure all common food allergens are in bold font.

**5. What would be an appropriate duration of time for stock in trade provisions?**

ASCIA suggests that there is a two year timeframe for manufacturers to comply with the proposed changes to labelling.

**6. Do you expect to have any notification<sup>6</sup>, education<sup>7</sup>, permission<sup>8</sup>, purchasing<sup>9</sup>, record keeping<sup>10</sup>, enforcement<sup>11</sup>, publication and documentation<sup>12</sup>, procedural<sup>13</sup>, delay<sup>14</sup>, labelling<sup>15</sup> or any other costs associated with the proposed changes to the Food Standards Code?**

There will be some costs incurred by ASCIA, mainly to update ASCIA food allergy e-training for health professionals.

**7. Any views in relation to unintended consequences associated with Option 2 or 3.**

ASCIA cannot foresee any unintended consequences associated with Option 2 or 3.

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ASCIA is the peak professional body of clinical immunology and allergy specialists in Australia and New Zealand

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## FURTHER INFORMATION

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### ASCIA supports the following proposed amendments to the code:

- Separate declaration of fish (but not the specific fish species unless it is obviously known), crustacea and molluscs.
- Separate declaration of the nine most common tree nuts that cause allergy (almond, Brazil nut, cashew, hazelnut, macadamia, pecan, pine nut, pistachio, walnut), with use of the mandated specified term 'tree nut' in the allergen summary statement if individual tree nuts are declared in the statement of ingredients, and removal of the generic name 'nuts'.
- Separate declaration of wheat, barley, rye, oats, but with all varieties and hybrids of wheat such as spelt, triticale, freekah, kamut identified as wheat, by having **wheat** in bold next to the name.
- Use of the mandated specified term 'gluten' in the allergen summary statement if present from wheat, barley, rye, oats or their hybrids.
- Use of mandatory specified terms of the allergen source when declaring allergens, with declaration of allergens in the statement of ingredients using bold font and in a separate emboldened allergen summary statement.
- Allergens declared using specified terms.
- Synonyms not permitted for allergen declarations except in the case of soy, where 'soya' and 'soybean' will be alternatives to the specified term 'soy' for use in the statement of ingredients.

### ASCIA supports the following proposed actions regarding presentation of allergen declarations:

Allergens declared in the statement of ingredients using a bold font that provides a distinct contrast to ingredient names, and in a font size no less than that used for other ingredient names.

An allergen summary statement displayed in bold font, which:

- Includes the prefix 'Contains', followed by a list of the allergens present.
- Appears directly below, but distinctly separated from the statement of ingredients.
- Is printed in the same font type and size as declarations in the statement of ingredients.

### ASCIA recommends further engagement with key FSANZ stakeholders before finalising the changes.

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This submission was lodged on Thursday 27<sup>th</sup> February 2020, in response to the Food Standards Australia New Zealand (FSANZ) Proposal P1044 - Plain English Allergen Labelling (PEAL).