

27 February 2020

Food Standards Australia New Zealand
PO Box 5423
Kingston ACT 2604
Via email: submissions@foodstandards.gov.au

Plain English Allergen Labelling

Second Call for Submissions – Proposal P1044

Thank you for the opportunity to submit a response to the Food Standards Australia New Zealand (FSANZ) proposal to require allergen information be made clearer and more consistent through the use of plain English allergen labelling (PEAL) and display requirements.

Coles Group is supportive of the proposal to present allergen declarations in labelling information in a clear and consistent manner for our customers.

As part of the consultation process, Coles respectfully requests the FSANZ Board to take into account the following points in their consideration of the detail and proposed timeline for the draft variation.

The proposal suggests that allergens are to be declared in the statement of ingredients using a bold font that provides a distinct contrast to ingredient names. In addition, an allergen summary statement is also to be provided and displayed in bold font. Coles supports a requirement to use a bold font to contrast allergens within the ingredient list so that they are easily identifiable. However, we would query whether it is necessary for the allergen summary statement to also be in bold type considering it is already separately highlighting allergen information, clearly distinct from other information on the packaging.

FSANZ is also proposing for the draft variation to take effect on the date of gazettal, with a two-year transition period followed by a twelve-month stock in trade period. Given the considerable number of products that will require label changes as a result of this proposal, Coles suggests a longer transition period of five years which would align with the standard cycle of labelling updates. This would assist in reducing costs on suppliers - many of whom are small businesses - which would otherwise be incurred if they are required to alter labels outside of the standard refresh cycle.

In particular, products which recently underwent labelling changes in order to become compliant with allergen declaration requirements contained in the Australian Food and Grocery Council (AFGC) 2019 *Food Industry Guide to Allergen Management and Labelling* should not be financially penalised by a requirement to again change their labelling in such a short timeframe.

Thank you again for the opportunity to participate in the second call for submissions regarding this proposal. If you require any additional information on our comments above, please contact me directly on andrea.currie@coles.com.au or 03 9829 5001.

Yours sincerely