

PI044 Plain English Allergen Labelling – 2nd Call for submissions

Submission by the Department of Health, Tasmania

Contact details:

Monique Reardon

Senior Public Health Nutritionist (Regulation)

Public Health Services, DoH

PO Box 125 Hobart 7001

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Thank you for the opportunity to comment on the second call for submissions for Proposal PI044, *Plain English Allergen Labelling*.

The Department of Health, Tasmania (the Department) is supportive of 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 Department agrees with FSANZ's assessment that this option provides the greatest net benefit and is therefore our preferred option. Requiring allergen declarations to use bold font enables them to be clearer and easier to locate on a label, especially for products with a long statement of ingredients. The addition of an allergen summary statement further enhances consumers ability to easily identify potential allergens. Both labelling elements are required, one for a quick glance to see if the food contains an allergen and the other for a more detailed assessment. This is supported by FSANZ's consumer behaviour research. These two labelling elements are also consistent with the voluntary measure recommended in the Food Industry Guide and therefore should have minimal impact to food manufactures who already follow the voluntary guidance. Mandating these elements in addition to the location of the allergen summary statement will provide greater safety and consistency for consumers.

Option 2 (*Declare allergens using mandatory specified terms in bold font*) whilst a better option than Option 1 (*status quo*) does not fully address other inconsistencies identified in previous consultations. Option 2 requires a higher level of literacy and places a greater burden on consumers to determine the presence of allergens. Manufacturers are able to choose how they declare allergens on a label as long as its bolded resulting in a number of variations adding to consumer confusion. In addition, this approach creates greater uncertainty for industry in complying with the Food Standards Code and for regulators in enforcing the Food Standards Code.

The Department supports all other amendments to the Food Standards Code in relation to food allergens and does not see any unintended consequences associated with Option 3. These amendments to the Food Standards Code will ensure greater protection for food allergic consumers and enable consumers to make informed choices by clearly labelling products with this additional information. This is in line with FSANZ's objectives outlined in the FSANZ Act.