

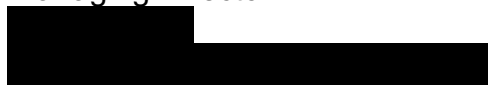
Application A1191 - Mono- and diglycerides of fatty acids (INS 471) as glazing agent for fruits and vegetables

SUBMISSION FROM:

Additive Free Kids



Managing Director



SUMMARY

As the Managing Director of Additive Free Kids, I represent over 25,000 Australian parents that are concerned about additives in their food. They seek to avoid additives to minimise health and / or behavioural issues in their children. Our children are most susceptible to these additives, as they have been approved on an adults body mass. Acceptable daily intake levels have not been established for children. On a daily basis we witness the impact that these additives have on our children's health.

Our community rejects the need to have emulsifiers applied to our fresh fruit and vegetables. We believe this processing aid is unnecessary in Australia (we are a leading food export nation). The processing aid is not for the benefit of the end consumer. Consumers have a right to make an informed choice and avoid this emulsifier. If it is to be applied, the community believes we should adopt the same position as the EU and apply to fruits with hard peels only that aren't consumed. Each new emulsifier that is derived from a different source (ie GMO / Animal origin) should be submitted for approval for use and shouldn't receive blanket approval if this processing aid is accepted. Fruit and vegetables should be kept as an unprocessed product.

Please view our petition with thousands of signatures and comments from the Additive Free Kids community here:

https://www.change.org/p/do-you-want-glazing-agents-applied-to-your-fresh-fruit-and-vegetables/c?source_location=petition_show

POSITION

As the Managing Director of Additive Free Kids, I represent over 25,000 Australian parents that are concerned about additives in their food. They seek to avoid additives to minimise health and / or behavioural issues in their children. Our children are most susceptible to these additives, as they have been approved on an

adults body mass. Acceptable daily intake levels have not been established for children. On a daily basis we witness the impact that these additives have on our children's health.

Our position on this application is as follows:

1. Australia is a leading food export nation

Australia historically produces far more than we consume domestically. We sell around 65% of farm production overseas, making Australia a leading food exporting nation. We don't have the same concerns and considerations that other countries do in terms of long transport times. We should be supporting local farmers and local production. This has worked well up until now, there is no need for a glazing agent to prolong shelf life.

Comments from our community:

"If buying local and seasonal foods was encouraged, then this product wouldn't be necessary. It is concerning that even organic foods may be treated with this product – usually people choose to purchase organic in order to avoid foods produced with chemicals and pesticides."

"All additives in our food should be labelled so that consumers have a choice to buy it or not. No additives should be exempt. There is very little need for this product in Australia except where produce has to travel further to be available in the far north of WA or Central regions, and those consumers should still get an informed choice to eat it or not"

"I don't want additives in / on my fresh food. It is unnecessary in Australia. All additives should be declared and labelled."

"Support Australian farmers so that transport miles are reduced and eat seasonally"

"We do not want or need to have access to all "fresh" fruit and vegetables, year round. It is a joy to look forward to seasonal produce. If you must have an out-of-season fruit/veg, then there is usually frozen produce available. If produce is imported from overseas, then it must have labels showing any additives. Also, if such produce is canned, dried or frozen, it should also be clearly labelled."

"Buy Australian- local if possible and keep it seasonal! No emulsifiers"

"Food should be left seasonal, seasonal is fresh and local."

"Because we need a smarter, more localised food system, not glazed fruit and veg - especially when that glazing agent may come from sources that do our planet and animals harm. I fully support this petition."

2. Consumers should have the right to an informed choice

Consumers want to make informed decisions about what they are consuming on their fresh fruit and vegetables. They believe that fresh fruits and vegetables should be unadulterated.

If this additive is approved for use, Apeel Sciences have stated that it is possible to identify products that have used Apeel with an identifiable marker on the sticker of the fruit or vegetable.

We request FSANZ to require that this marker be used by all partners using this product in Australia. This will ensure that the end consumer can make an informed decision and vote with their dollar.

Comments from our community:

"It is scary that this can not be washed off. More scary that this may have been used without anyone's knowledge and as a consumer, I have the right to know what is on my food!"

"I like the option of knowing what I am consuming. I'm sick of companies modifying produce just to make money. Meanwhile the public is getting sicker and sicker with sneaky additives in our foods. Leave our fresh fruit and vegetables alone"

"Consumers need to be able to make informed choices, with 100% transparency"

"I don't want things added to my fresh fruit and vegetables. Unlabelled means that I can't make an informed choice to avoid the additives either"

"I should get to choose what goes into my body!"

"All additives should be declared, there shouldn't be an exemption for processing aids"

"Lack of transparency, it is everyones right to know what is on the food we ingest. There is no need to add anything to organic produce. I required food as nature intended"

"I want to know what I'm putting into my body"

"We need full disclosure of the additives added to fresh food"

"I want all added ingredients clearly declared so that consumers can make informed choices"

"I like to know what my family and I are eating, it is not acceptable to be adding to the produce without my knowledge. We eat seasonally and do not feel it is necessary..."

"I need to know exactly what I'm eating. With food and chemical intolerances, I need to be aware of what I'm putting in my body and that of my children. I expect that the fruit and veggies I purchase are whole foods - nothing added and nothing taken away. Where this agent is deemed necessary, mandatory labelling, irrespective of the amount of agent used, must be applied for full transparency for consumers."

"I want freedom of choice with regards to what I am consuming and by hiding the facts, not

willingly sharing the ingredients and not clearly labelling anything you have 'altered' is not okay!"

"We deserve transparency in what is being done to fresh fruit and vegetables before they reach the consumer"

"We have the right to know and choose what is on / in our food and this takes away that choice"

"I have children allergic to these ingredients. Labelling is needed at worst, but at best this shouldn't be used at all. Why not eat seasonal produce?"

"My fresh fruit and vegetables should be just that – FRESH! If I'm buying organic I should have the right to assume they have been grown organically and SHELVED organically!"

"We have a right to informed choice. We should know all of the ingredients on/in food we consume. We should be able to wash away any emulsifiers on our vegetables. What is someone was allergic to the emulsifiers?"

"I want to make informed choices about the food I buy. I want this process and additive to be declared so I know what I am buying and feeding my family. It is unacceptable for this to be hidden. If it is not declared then consumers are being deceived. Consumers have the right to know this information."

"I want my fruit and vegetables not to be contaminated with anything!! I am appalled that it won't be labelled so not giving us a choice!"

"I want to know what I'm buying and consuming for the health of my family."

"My family deserves the option of avoiding additives if we want to. I find it horrendous that this may happen and we won't even have the option of choice."

"I am strongly against this! Fruit and vegetables should be free of "processing aids" as they are NOT processed foods! People shouldn't need to check for additives on their fresh produce. Aside from that anyone should be able to know when they are inadvertently consuming something which contravenes their moral and ethical food choices. If they want to put unnatural substances on my food then it should be clearly stated."

"We should have the right to choose what we consume, use and wear..."

"We deserve transparency when choosing what we consume!"

"Our future generations have the right to choose and know what they are consuming"

"Free agency is our right. We loose this when damaging ingredients / processing aids such as this enter the food system with no identifying marker."

3. Long term studies required

Recent scientific evidence shows that emulsifiers have long term impacts on gut health. Apeel Sciences should be requested to provide long term studies to prove that these emulsifiers do not impact our gut health. This processing aid should not be approved until this can be provided.

If FSANZ believes this processing aid should be approved it should be noted that Apeel Sciences has stated that this product cannot be rubbed off a fresh fruit or vegetables without damaging the fruit or vegetable. We request FSANZ to adopt a similar approach to the European Union – it should be used on FRUIT only where the peels aren't consumed – ie avocados, banana etc. In this way, it is not liable to have an effect on human health.

Comments from our community:

"I am horrified that the stuff can't be washed off as I like eating fruit and veg with the skin on, for extra fibre"

"I don't want my family ingesting unnecessary emulsifiers"

"We don't need more additives on our fresh foods. It won't be labelled and E471 can't be washed off, so if you eat the skins you will be eating E471. No thanks, not for me or my loved ones"

"I want my fruit and vegetables as fresh as possible without additives that I'm not aware of and unsure of how they will affect my family long term"

"My family wants to eat real, fresh food, not food coated in emulsifiers that could potentially be harmful in the long term"

"I have 3 x children all severely intolerant and sensitive to many foods including chemicals, additives and preservatives. I rely on organic produce and the assurance the 'certified organic' tag provides, to ensure my children have safe access to food that causes them no harm. To coat our natural food with unnatural, man-made chemically produced oils will cause my children significant health issues. Moreover, there is too much information now available on the long-term health risks of consuming chemical-filled food to justify the use of these products on our fruit and vegetables. I have had enough of the Government taking away our right to access safe, chemical-free food."

"When are we going to realise how much all the various chemicals and additives are costing our health system? We as humans are not designed to have our bodies bombarded with them!"

"Don't keep adding this to our food. The long term health effects are not known. The build up of these ingredients in our bodies are not known."

"I don't like the idea of things being added to fresh fruits and vegetables. Shelf life SHOULD NOT be more important than health!"

"I do not want something added to my fresh food, that I cannot remove completely. Just NO!"

"I don't want this on my organic fruit or veg or for the bit of non-organic food I get, I don't want it there either! I often use the peels in other ways, including in my compost and in making stocks or cleaners."

"My family is sensitive to chemical additives. Headaches, gut aches, behaviour changes, rashes, asthma among other symptoms. We can't eat processed food as a result. Please don't make fresh fruit and vegetables hurt us too."

"Just have a look at chronic disease rates in this country and how that lines up with the amount of unnecessary, artificial rubbish allowed in our food system. time to start banning additives NOT adding them to our fresh produce!!!"

"My children and I, along with many of our family members, have numerous allergies and intolerances. This food additive could further limit the foods that we are able to eat without having an adverse reaction. This is unnecessary adulteration of fresh food products"

"I do not want glazing agent E471 applied to my fresh fruit and vegetables. This product isn't able to be washed off my food therefore is an additive. NO to E471"

"I purposefully buy as much organic produce for my family as possible as I am vehemently opposed to anything being added to my food including this emulsifier. Especially as it cannot be washed off. I'm not ok with this proposal whatsoever."

"I believe this is unnecessary and is not in the best interest of the consumers health. Should the agent be used it should be identified on the product with CLEAR labelling. Given it can't be washed off certainly raises alarm bells about it safety."

"Health is everything. We cannot keep adding chemicals to food and think there is no longer term cost to the health of the individual and the health care budget."

4. Further clarification on how this additive has been derived

It is our understanding that this additive can be derived in a number of ways. It can be GMO, derived from animals or palm oil or other sources. Apeel Sciences has declared that this is not a GMO product and is suitable for vegetarians. We request clarification as to whether or not this product has been derived from palm oil specifically as it impacts a consumers buying decision.

Comments from our community:

"My stomach is highly sensitive to ALL oils, so I must avoid oil. If I don't even know it is on my fruit and veg I will end up very sick."

"There is no need to put these oils on fruit and vegetables. As I have an intolerance to soya, for health reasons I would have to avoid all fruit and veg that have this treatment. As it will not be disclosed which oil is used, I am at risk. Do not allow this to be done to our fruit and veg"

"I have children allergic (including anaphylaxis) or sensitive to many of the foods these additives are proposed to be created from. We have historical reactions even to undeclared oils, and the idea that FRESH fruit and vegetables would cease to be safe foods for my children is horrifying."

"There are many who are anaphylactic to some of these ingredients like soy, making it hard for them to even eat fruit which should be safe for them. They will need to check all food they consume for any of the dangerous ingredients. When its daycare supplying foods they have even more trouble as they can have multiple children with different allergies and children with some illness or conditions who can't eat some things. This makes it so much harder."

"I cannot believe how far they can go. I have heaps of mitochondrial and autoimmune issues and cannot eat rubbish oils/soy. Far out"

"I believe our fresh foods should not be tampered with in anyway. I am vegan and do not wish my fresh fruit and vegetables to be covered with an unnatural product which may or may not be derived from an animal."

"Definitely not as I have an Anaphylactic allergy to an unknown chemical number I must avoid all food with any chemical additives this would absolutely destroy the limited foods I can actually eat"

"As someone with multiple chemical sensitivities I don't want to be second guessing the already limited number of food I can eat. Especially with an additive that will not have to be labelled."

"Our fresh food needs to stay additive free. If this is added to our fresh foods it may mean more people having allergic reactions, causing hospitals and medical clinics to be busier. If it is an animal derived product that also means people who follow a plant based diet will be restricted in what they are able to eat. Australia does not need this product"

5. This submission covers one supplier Apeel Sciences. Will other suppliers be subject to the same submission process?

If other manufacturers want to apply a glazing agent to fresh fruits and vegetables, that may be derived from GMO sources or animal origins, will they be subject to the same submission process? How is the consumer able to differentiate the glazing agents for a plant source (palm oil or other), GMO or animal origins. These distinctions are important to consumers.

6. Application of emulsifier to fresh fruits and vegetables results in an ultra processed product

Traditionally, fruits and vegetable are considered an unprocessed or minimally processed food. It is well recognised according to the NOVA classification of food, that the application of emulsifiers to our food results in an ultra processed food. This is not necessary when we should be driving consumers to eat an abundance of fresh fruit and vegetables. It should be preserved as an unprocessed product.

Comments from our community:

"I want natural food not tampered in any way"

"Stop playing with our food, we want it in the original state it was intended for us to eat"

"Wholefoods are our only source of real and wholefoods. Stop destroying it"

"I do not want my family to consume this highly processed emulsifier"

"Wholefood is the last safe space for those with sensitive diets or those who just want to have a clean diet. Don't take fresh produce away too!"

"When you put additives on fruit, it is no longer pure. What about all those people with allergies? I am one!"

"Let's keep our fruit and vegetables "Fresh" and "pure" Stop making our foods an experiment!"

"I just want food grown as nature intended. No man made manipulation."

"We don't want fruit that's been 'preserved!' We want fresh, wholesome and unadulterated fruit!"

"I don't want the shelf life of my fresh produce extended"

"Fresh is better than preserved via a film"

"We should have access to fresh clean fruit and veges"

"This scares me! Why do you feel the need to mess with nature? What if people react or are allergic to those 'edible' ingredients? They won't be able to eat fruit and veg unless they farm themselves? Please leave our food as nature intended, it's hard enough in this busy world with having unnatural things added to everything we touch"

"We have the right to make an informed choice. Fresh food is no longer "FRESH" if it is out of season and has been coated in something to preserve it!"

"My family has a variety of dietary issues and the last thing I want is something sprayed on my fruit and veg so they are no longer just fruit and veg! Hands off our food!"

"Leave our food alone. I understand food doesn't have a very long shelf life but we want to eat it as naturally as it comes off the tree, plant, bush."

"Our system regarding 'food' is appalling anyway. Packaged food on a shelf made in a factory is not food. Don't destroy our fresh fruit and veg that we can count on to actually be fresh and nourishing for our families. No more taking away choice and promoting ill health, you are destroying our children's future"

"Stop adding crap to our fresh food! We don't need this nor do we need 'perfect looking' produce as dictated to us by the big supermarkets. We just want healthy, fresh, natural and untainted fruit and veg."

"Leave our food alone! It is hard enough to buy products free of additives, don't take away one of our only options, fresh fruit and vegetables!"

"It makes me so angry. It's hard enough to feed my chemical intolerant son as it is without ruining fresh food!!!"

"Everyone deserves clean food. Messing with Mother Natures pure and healthy gifts is a crime."

"I eat fruit and veggies to be healthy and to keep my family healthy. I don't want anything not naturally occurring on my fruits and veggies. If I did I would eat processed food all the time! Just fruit and veggies, NOTHING ELSE! Please let us have some things left that are not modified or processed or altered!"

"I strongly believe that our children have the right to a healthy life. It angers me that this right is being taken away without their consent. All for the mighty dollar to line some CEO 's pocket!"

"Fresh fruit and veg should be FRESH. Not coated in emulsifiers designed to make supermarkets more profit!! Fresh local growers for me!!"

"I just want to eat natural food that has not been sprayed, waxed, gassed or coated in any other substances. I could as a child and today's children deserve that too."

"We have a basic right to choose what we ingest into our bodies and no fresh food source should be tampered with .. it then is no longer a pure food and our choice is snatched away to keep our bodies well in the way which we have a right to choose. Please do not pass this as it is totally unnecessary and interferes with our pure food source."

"Fruit and Vegetables should be sold in their pure form. Additives can cause serious allergic reactions. If these are routinely used without disclosure, it would make it very difficult for consumers to avoid if they chose to. Keep it real!"

SUMMARY

Our community rejects the need to have emulsifiers applied to our fresh fruit and vegetables. We believe this processing aid is unnecessary in Australia (we are a leading food export nation). The processing aid is not for the benefit of the end consumer. Consumers have a right to make an informed choice and avoid this emulsifier. Fruit and vegetables should be kept as an unprocessed product.

If it is to be applied, the community believes we should adopt the same position as the EU and apply to fruits with hard peels only that aren't consumed. Each new emulsifier that is derived from a different source (ie GMO / Animal origin) should be submitted for approval for use and shouldn't receive blanket approval if this processing aid is accepted.