

# Response to: Proposal P1031 Allergen Labelling Exemptions

## FSANZ consultation closing 23<sup>rd</sup> September 2015

Dairy Australia is the dairy industry owned service organisation, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation.

Dairy Australia welcomes the opportunity to comment on the Consultation: Proposal P1031 Allergen Labelling Exemptions and provides the following comment.

### General Comment:

Dairy Australia supports regulation that is consistent with the objective of achieving the following outcomes:

- Science/evidence based;
- Outcomes focussed;
- Proportionate to risk;
- consistently enforceable;
- Support innovation;
- Support and promote trade; and
- Support competition

When considering P1031 Dairy Australia generally supports the proposal to exempt the identified four products, 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, and alcohol distillate made from wheat or whey from mandatory labelling requirements for allergens on the basis of general consistency with the above principles.

### Specific Comment regarding glucose syrup derived from wheat starch:

When considering the promotion of consistency between domestic and international food standards we note that the proposed residual gluten content limit for glucose syrup made from wheat starch to be exempted from mandatory labelling is proposed to be set at <10mg/kg. A level significantly inconsistent with international food standards of < 20mg/kg.

Dairy Australia suggests that further data should be sourced from international jurisdictions with current <20mg/kg limit and producers of glucose syrup made from wheat starch for further consideration to ensure a limit is set that is: evidence based; outcomes focussed; proportionate to risk; whilst still supporting and promoting trade and competition, and the benefits outweigh the costs.

### Contact

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