

## **Submission to:** **Food Standards Australia New Zealand**

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In response to:

### **PROPOSAL P1031 – ALLERGEN LABELLING EXEMPTIONS**

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*"Sharing health and hope  
for a better life"*

## Introduction

### Preamble

Sanitarium Health and Wellbeing began in 1898 with the vision to help people 'learn to stay well'. Our mission is to **'inspire and resource our community to experience happy, healthy lives'**. We have been committed to this philosophy for over 100 years and it is the reason we exist today. Sanitarium also believes that good business is based on trust, respect and community involvement.

Sanitarium has a strong history of educating the community about healthy eating and healthy lifestyles. All of Sanitarium's activities have twin goals in mind - to provide healthy foods that actively improve our community's health and well-being, and to offer easy-to-understand nutrition information and practical health advice.

Sanitarium Australia and Sanitarium New Zealand are owned and operated by Australian Health & Nutrition Association Limited and New Zealand Health Association respectively. We produce over 150 products and employ approximately 1700 people in our manufacturing and distribution sites throughout Australia and New Zealand.

Sanitarium welcomes the opportunity to comment on the development and evolution of the Australia & New Zealand Food Standards Code. We believe we can provide a unique perspective and give valuable suggestions into the food policy and standards development in Australia and New Zealand.

*Information contained in this submission has been drawn from the experiences of Sanitarium, and contains no commercial-in-confidence material – unless otherwise highlighted.*

## **Discussion**

Sanitarium appreciates the opportunity to make this submission to FSANZ in response to the call for submissions on Proposal P1031 Allergen Labelling Exemptions for specific food ingredients derived from allergenic sources.

### **Question 5. Do you have further considerations to add to the cost benefit analysis?**

Overall the proposed exemptions present a net benefit.

Costs in relabelling products will naturally be experienced, however, Sanitarium recognises that these label changes can take place gradually as the proposed variation is an exemption rather than a prohibition. Other costs that may be experienced initially, relate to responding to consumer questions about why changes have been made to our labels.

Benefits to industry as discussed include reducing the length of ingredient lists and allergen summary statements on packaging, therefore freeing up space on food labels. The proposed exemptions would also increase alternative ingredient choices for food manufacturers without the need or added cost for relabelling. Further benefits also include alignment with international regulations and increasing the food choices available to allergenic consumers.

### **Question 6. Do you agree/disagree with the proposed exemptions? Please provide information to support your comments.**

Sanitarium supports the proposal to allow for specific exemptions from allergen declarations for glucose syrups from wheat starch, fully refined soybean oil, soybean derivatives (tocopherols and phytosterols) and distilled alcohol from wheat or whey.

Sanitarium notes that P1031 is for the specific food ingredients mentioned above, however we would welcome this proposal being expanded to include other suitable materials, thereby further increasing food choices for allergenic consumers and relieving industry of the labelling burden for materials which through production methods removes or reduces allergenic proteins. Of particular interest would be the inclusion of maltodextrin derived from wheat starch which is already included in European Union regulations.