FOOD INTOLERANCE NETWORK

PO Box 718
Woolgoolga NSW 2456
Ph 02 6654 7500
Fx 02 6654 9566
confoodnet@ozemail.com.au

www.fedup.com.au

20 November 2009

By email to FoodLabellingReview@health.gov.au

SUBMISSION TO REVIEW OF FOOD LABELLING LAW AND POLICY

The Food Intolerance Network (FIN) makes the following submission to the Labelling Review on behalf of 7,000 member families who are vitally affected in health, behaviour and learning by ingredients in our daily foods.

At the outset FIN wants to make clear that we agree with the Australian Consumers' Association about the need for a mandatory, consistent front-of-pack labelling system on all packaged food. We agree that we need to get away from the current mendacious and distracting claims such as fresh, natural, traditional, original, plain, pure, gourmet, wholesome, simple, goodness, 100%, finest ingredients, homestyle, garden fresh – these words are advertising and cause consumers to make bad choices and need stronger and clearer regulation.

Regulation is also clearly required for misleading health claims and front-of-pack nutrition labelling. Such labels are subject to legal gaming and it is easy to circumvent any present black-letter regulation. For instance, the best way to get a low GI is to increase fat (Mars Bars are very low GI but scarcely healthy). Therefore we understand and support government being involved in this area.

However the major objective for our members is to have government regulate for honesty and full information on Ingredient Panels. This submission focusses on that objective.

Our submission is organised according to the six Matters for Review.

Matters for Review:

1. **Examine the policy drivers impacting on demands for food labelling**

It is our view that the main policy driver for improved food labelling is a strong developing sense of personal responsibility for health and what we eat, as shown by the survey responses of 100,000 consumers undertaken by Australian Meat and Livestock in 2008 (Attachment A).

This increased focus on health has exposed a significant lack of trust in current food labelling and, in fact, in the entire food regulatory system, meaning that the second policy driver should be restoration of consumer trust in the food we eat.

Evidence for the need for such policy drivers comes from the above survey and from surveys by the Food Intolerance Network (Attachment B) and FSANZ (Attachment C).

- **MLA:** 78% (of 100,000 Australian consumers surveyed) are making a real effort to avoid foods that contain preservatives, artificial colours and flavours, 73% think that food authorities are not doing enough to regulate what food manufacturers can and can't put in the foods, and 80% don't always trust the claims food manufacturers put on their labels and read more labels than before because they worry about what's in the foods (Attachment A).

- **FIN:** 96% (of 648 Australians surveyed) believe that food additives should be better tested before they are approved (Attachment B).

- **FSANZ:** 61% (of 1200 Australians and 800 New Zealanders) lacked confidence in organisations providing regulation and monitoring of the food supply. 26% of people did not trust the information on labels, although 48% did (Attachment C).

These surveys, taken together, show clearly that our consumer concerns are shared by the clear majority of consumers and are not, in fact, the minority view regulators would have us believe

These two concerns should therefore be the main policy drivers of any changes to labelling and the food regulatory system.

2. **Consider what should be the role for government in the regulation of food labelling. What principles should guide decisions about government regulatory intervention?**

FIN submits that the **principles** that should guide decisions about government regulatory intervention must include:

- A primary focus on protection of the consumer (rather than of the food industry)

- Use of the precautionary principle in approval of food additives and novel ingredients (rather than conducting mass experiments on consumers after inadequate industry-run testing)

FIN submits that government should have two **roles** arising from these principles:

- Ensure that consumers have clear, honest and transparent information about the ingredients in their food and the source of that food so that they may make an informed choice.

- Ensure that ingredients are tested completely before approval and are monitored afterwards, with proper enforcement of regulations so as to protect consumers.

Taking these two roles in turn:

Information: from a consumer point of view, particularly for the many who are affected on a daily basis by foods, it is a fundamental that the Ingredients Panel on all foods should inform exactly and completely what is in the food.

For the last 20 years food intolerance sufferers have been dismissed by Federal and State/Territory Ministers who say that all we need to do is read the Ingredients Panel to avoid those ingredients which cause us harm.

In fact current Ingredients Panels do not allow consumers to make an informed choice because of the 5% labelling loophole, the use of ingredient names that only a trained chemist can recognise, the use of meaningless disclaimers on labels, the increasing practice of hiding additives as ingredients, and sometimes the outright mislabelling of foods. These issues are expanded in Section 5.

In addition, government should accept responsibility for an educational role about food ingredients. For instance, even the conservative World Health Organisation acknowledges that 20-30% of asthmatic children react to sulphite preservatives (220-228) but two thirds of consumers have no idea of the connection. This is a government role through labels and other education outlets and should not be left to volunteers.

These information issues are expanded in Section 5 below.

Testing: Some food additives can affect health, behaviour and learning in both children and adults (see references in Attachment D), but regulatory approval does not take this evidence into account. Present testing pronounces ingredients and additives as “safe” on the basis of a deliberately limited scope of testing rather than a scientifically justified and comprehensive testing regime.

Quality science in this area is routinely ignored or minimised by regulators even when the science shows that these ingredients can cause daily problems for a sizeable proportion of the population. Consider that additives, for instance, are not tested on children before approval although children are major consumers of additives (FSANZ staffer: “it would not be ethical”!); that additives are not tested in combination although they are always used in this manner (FSANZ staffer: “just too difficult”); and that additives are not tested for effects on any forms of behaviour before approval.

The precautionary principle would require that these additives are not approved because the required logical testing has not been carried out.

Contrary to the Act under which food additives are approved for use, FSANZ has even approved additives without any scientific evidence of their safety or otherwise, as mentioned in (5) below.

There is also very poor enforcement of regulations, to the extent that even FSANZ officials admit off the record that they can walk into any supermarket and find dozens of breaches of label regulations. It is not presently a FSANZ responsibility to police the market, yet the States/Territories do not have the expertise, funding nor motivation to enforce action against the powerful food industry.

These testing issues are addressed in Section 3 below.

3. Consider what policies and mechanisms are needed to ensure that government plays its optimum role

It is the view of FIN that the present split between approval of food standards at the Commonwealth level and enforcement at the State and even Local Government level has become unworkable with the national and indeed international nature of today's food industry.

Each State/Territory having a separate food authority (by whatever name) clearly leads to massive duplication of effort. The experience of our members in lodging complaints is that the different jurisdictions all have to work together anyway so as to provide word-identical responses from any jurisdiction.

There is also marked disparity in funding, expertise and willingness to address consumer issues between jurisdictions. Local government in Victoria, for instance, is unable to address any label issues while States/Territories always refer label issues to the State/Territory where the main food factory is located. The consumer experiences this as a bureaucratic run-around and loses more confidence in government. Our feedback from members is that nobody ever knows how to report illegal labels effectively.

It is time to consider creating a National Food Authority with responsibility for both standards and enforcement, so as to optimally address the two roles for government outlined in 2 above.

In terms of mechanism, the Australian Food and Grocery Council recently promoted itself (http://www.afgc.org.au/index.cfm?id=892) as Australia's largest manufacturing sector, with $100 billion annual turnover and employing 315,000 people. Yet the fresh and processed food, beverage and grocery industries do not currently support any form of levy which could be used to improve food research, food monitoring and enforcement. Such a mechanism has worked well with primary industries and it would be timely to extend it towards this important manufacturing sector.

With a funding mechanism in place, it would be possible to undertake the required level of testing of additives and novel ingredients in a proper scientific manner and so address consumer concerns about their effects on health, behaviour and learning that are presently ignored. For instance, although scientific evidence is a requirement under the Food Standards Australia New Zealand Act 1991 before approval of additives, when FIN used Freedom of Information to request the evidence on two additives of concern in 2003 we were told that "such documents do not exist." This implies clear breach of the Act. Such an admission calls into question the credibility of everything FSANZ says, and the competence of the organization as a reliable regulator of food standards. This situation could be materially improved by acting on the recommendation FIN has made above.

4. **Consider principles and approaches to achieve compliance with labelling requirements, and appropriate and consistent enforcement**

The National Food Authority suggested in Section 3 would go a long way towards providing the appropriate and consistent enforcement of labelling requirements. These are national and indeed international issues now and it is no longer appropriate to devolve such responsibilities to local councils as is done in Victoria.

The current principle of self-regulation by industry and the use of nebulous GMP (Good Manufacturing Practice) regulation has lead to widespread and blatant flouting of the regulations, with industry lawyers playing word games, the government going along with it, and consumers demonstrably losing confidence in the food regulation system.

The principle should be, as expressed in 2 above, a primary focus on protection of the consumer. It is inappropriate to have as a principle protection of the food industry when that industry profits by incorrect or misleading labelling which harms consumers.

The consumer needs to know that what is on the Ingredients Panel is true. Information must be clear, honest and transparent, and consumers need to be able to believe that sound science and the precautionary principle have been applied in approval of food additives and novel ingredients.

FIN has run a Nasty Food Awards area on our website for some years, mostly focussed on labels and misleading of consumers (http://www.fedupwithfoodadditives.info/extras/NASTY%20FOOD%20AWARDS.htm). Due to various legal threats we have had to ease off on this area, but it would increase compliance and serve as a useful educational tool for the food industry if government ran a similar “name and shame” link on labels.

5. **Evaluate current policies, standards and laws relevant to food labelling and existing work on health claims and front of pack labelling against terms of reference 1-4 above**

In our view, there are six issues which need to be addressed so as to allow consumers to make an informed choice. These are:

- **Remove the 5% labelling loophole**

Unlike EU Food Standards, the current Food Standards Code (FSC) allows Australian and New Zealand food manufacturers to avoid identifying additives in ingredients which form less than 5% of the final food.

Presently, food manufacturers are only required to show additives in ingredients at levels less than 5% "where the food additive is performing a technological function in the final food" (FSC, 1.2.4 Table to Clause 6). The food manufacturer decides whether there is a technological function and, given the desire for a "clean label" (no additives shown), nearly always decides that the additive no longer performs a technological function. Yet people are still affected by the levels present and are not given the opportunity to choose to avoid them. The only way that a consumer can find out is to ring the food manufacturer, who may or may not tell them.

Examples of 5% labelling loophole issue

McCain's Health Choice Chunky Cut frozen chips
Ingredients: potato (97%), vegetable oil (canola), dextrose (wheat).

A consumer can identify that the oil is less than 5% using arithmetic, then must ring the manufacturer to find that the oil contains synthetic antioxidant 320 (butylated hydroxy anisole). Alternative products, such as Logan Farm and Woolworth's Home Brands do not contain synthetic antioxidant, but the labels cannot allow the consumer to reach this conclusion.

Soymilks are a particular concern because their oil content is typically slightly less than 5% and there has been an explosion in the range of choices available on the shelves. Consumers find it nearly impossible to keep up with which cartons do not contain synthetic antioxidants, given the frequent changes in oil supplies to manufacturers, poor and conflicting information given to consumers by manufacturers, and the absence of any guidance on the Ingredients Panel of most. This leads to a loss of confidence in the regulation of food additives generally.

The Food Standards Code appears to have provision for manufacturers to "be asked to substantiate why a particular additive is or is not being declared in an ingredient list" (FSC 1.2.4 Editorial Note on Clause 6) but despite many complaints over the years this has never resulted in any prosecution or change.

In August 2006 FIN attempted to use formal FSANZ processes to require labelling of antioxidants at less than the 5% level due to the level of complaints received by the Network. Details including scientific references are available at http://www.fedupwithfoodadditives.info/support/ApplicationA555a.pdf. Application A555 was eventually withdrawn rather than surrender an opportunity to submit more evidence in the future, in other words for bureaucratic rather than scientific reasons.

- **Reduce use of ingredient names that only a trained chemist can recognise**

In the search for "clean" labels that do not show numbers in the Ingredients Panel, food manufacturers frequently seek to mislead and confuse consumers by showing names of additives, not numbers, and by using alternative names that suggest innocuity and even health so as to avoid informing consumers.

Even a trained chemist may find it difficult to identify that ingredients shown variously as hydrolysed, autolysed and/or formulated, vegetable/soy/wheat/plant protein/yeast, HVP/HPP, yeast extract/vegetable broth are all in fact means of avoiding saying that "we have added monosodium glutamate to this food", particularly when the label may even claim "no MSG" or "no added MSG"!

The review panel needs to be clear that the phrase "clean label" is a concept developed by the food industry and is frequently used in their trade journals and advertisements. What consumers want is a food without harmful additives. What the food industry wants, apparently, is food that appears to not contain these additives, at least on the label, regardless of the true content.

Examples of deliberate confusion of consumers

Cottee's Coola Lime Flavoured Cordial
Ingredients: water, sugar, concentrated apple juice, food acid (citric acid), flavour, preservatives (sodium benzoate, sodium metabisulphite), colours (tartrazine, brilliant blue FCF)

When this label emerged, many mothers contacted the Network to say that they had found a safe cordial without any numbers in it. It is misleading and deceptive to hide preservatives 211 & 223, and artificial colours 102 & 133 as names.

Fantastic Original Rice Crackers
Ingredients: rice flour, seasoning powder: [sugar, salt, soy sauce powder [contains soy, hydrolysed wheat (gluten free)], flavour enhancers E627, E631, vegetable oil (antioxidant 306).

It would take chemistry training to recognise that this product is predominantly flavoured by monosodium glutamate (MSG 621) from the hydrolysed wheat, with the effects of that additive boosted 10-15 times by the addition of the inadequately tested ribonucleotide family of flavour enhancers. Since both MSG and additive 635 have received a well-justified bad press, food manufacturers have swung to hidden sources of MSG and to showing the component ingredients of 635, which are 627 and 631.

Not only is there no consistency regarding what words may appear on the label to avoid saying what is in the food, there is also no apparent enforcement of labelling requirements. This leads to absurdities where ingredients are listed that do not appear in the Food Standards Code (such as hydrolysed vegetable protein above) or cannot be purchased in any store (such as a “flavour” that makes up 7% by weight of a rice cake).

- **Stop meaningless disclaimers on labels**

There is an old joke about Microsoft answers that are technically and legally exact but practically useless, and increasingly consumers are seeing such disclaimers and information on their foods. From the food manufacturers’ point of view they want to avoid legal action from consumers, but when consumers can no longer tell what is in their food they tell us they have a complete loss of confidence in the labelling system.

Some examples of “Microsoft” information:

- It is legal but practically useless for allergy sufferers to see on all food labels a disclaimer such as “processed in a factory that also processes wheat, soy, peanuts, and fish”. This allows the food manufacturer to technically avoid legal issues but means that certain consumers cannot trust a huge range of products.

- Similarly, it is legal but diffuse to put the phrase “may contain” on all Ingredient Panels, as in “may contain wheat” or “may contain traces of peanuts”.

- Many consumers want to know where their food is coming from, based on concerns about food miles or poor regulation of pesticide use in some countries. Therefore a label which says “made of local and imported ingredients” both fails to identify which ingredients come from which country, and to say which country has supplied the food. There is a widespread belief, which may even be true, that this label can be put for instance on a can of food where the can is local but all the ingredients are imported.

- **Don’t allow the hiding of additives as ingredients**

The use of compounded flavours as a vehicle to incorporate colours and even preservatives without declaration on the label was the subject of a FIN submission to FSANZ in 2004 and resulted in an industry warning, but it is still widely practised. There are many examples in any store of foods that contain no apparent source of colour on the Ingredient Panel yet are brightly coloured, presumably by the ubiquitous catchall “flavour” ingredient.

Two examples of flavours being used to hide additives

Product labeled “All Natural - No artificial Colours or Flavours, No Colours, Flavour: Natural (orange)

It took one mother 5 separate emails to drag out of a food company that “Our supplier is unable to disclose the formulation of this flavour for proprietary reasons” but consists of maltodextrin (cornstarch or tapioca starch, *which may contain sulphites* [phrase added]), vegetable gum (414), natural flavours (orange oil, freeze-dried orange spray), vegetable oil, antioxidant (320 butylated hydroxyanisole)

Icecream including vanilla flavour in the Ingredients Panel

This mother found her son so loud and noisy and worse the next day that she rang the manufacturer, to be told that the vanilla flavour contained sodium benzoate 211, to which she knew he reacted. There were no additives shown on the Panel.

Alongside this food industry practice is an obvious trend to avoid the bad press given to “numbers” and to use “natural” sources of food additives. Some examples include the use of “whey powder” or “fermented whey powder” to incorporate the bread preservative calcium propionate 282 without declaration on the label, and the use of “hydrolysed wheat protein” (by many names and acronyms) to incorporate monosodium glutamate MSG 621 without overt declaration.

- **Enforce regulation to stop outright mislabelling of foods**

The mislabelling of foods may be either deliberate or accidental but complaints to Federal and State authorities in both cases usually result in no action, so that consumers are forced to ask why we have regulation if it is not enforced.

Examples of mislabelling include:

- showing illegal additives (eg chrysanthemum petals for yellow colour),
- showing ingredients generically so as to hide the identity and source of specifics (eg the term “vegetable oil” to hide palm oil which has a bad press on health grounds),
- not showing additives which are present although we know they are technologically required (eg sulphites are usually in high levels in glucose syrup),
- showing a misleading form of the ingredient (eg “yeast” when the ingredient is actually “hydrolysed yeast” and hence a source of MSG 621, as in Marmite),
- complete variance with front-of-pack information (eg “All natural ingredients” when the Panel shows MSG 621), or
- simply mistaken declarations, like “preservative 120” when 120 is a colour, or just a statement “colour” without specifying which one.

One of the most egregious examples of mislabelling is that of the food staple beef mince. By law it is not permitted to contain any sulphite preservative and is usually labelled “preservative-free”. In 2004 our members were equipped with sulphite test strips and found that 43% of Australian mince contained sulphites. FIN was criticised for using a non-standard test and the conclusion pooh-poohed by regulators, but when NSW then undertook the same survey they found that 58% of mince tested contained sulphite preservatives. Full details are available at http://www.fedupwithfoodadditives.info/features/sulphites/sulphites.htm and http://www.fedupwithfoodadditives.info/factsheets/Factsulphites.htm.

When we do obtain a response to formal complaints about mislabelling issues, the usual and unsatisfactory response is that the food company is “just using up old packaging.” In one instance this took three years. Strangely enough, the mistake is never deliberate, nor prosecuted.

Policy must be for actual on-the-ground enforcement of regulation if regulations exist.

- **Accept an education role for government**

As briefly mentioned above (Section 2), even the conservative World Health Organisation now accepts that 20-30% of childhood asthmatics are affected by sulphites and urges regulators to reduce the use of sulphites, while Australian research using a better baseline has found that more than 65% of children with asthma may be affected. Yet when FIN surveyed public understanding of the link, about two thirds of motivated consumers has no idea of the connection between sulphites and asthma (Table below). The National Asthma Council only changed their advice on food additives and asthma under pressure from FIN and still does not concord with WHO recommendations.

Ingredient Panels currently note the presence of sulphites, as required by the Food Standards Code if levels exceed 10mg/kg, yet people don’t understand why they are highlighted.

The public health implications of this lack of knowledge are startling; so is the unwillingness to date of government to address the issue. Australia has some of the highest rates of use of sulphites in the world and highest allowable levels. Education action on just this one additive would have profound affects on Australia’s very high rate of childhood asthma.

Connection between sulphites and asthma

During a Food Intolerance Network speaking tour in May-June 2008, attended by more than 3,000 people, about 1,000 attendees were surveyed and 634 responses obtained.

Before this talk I had no idea that sulphites could cause asthma

	Strongly agree		No opinion		Disagree strongly	Total
	1	2	3	4	5	
Asthma	**323**	**101**	**42**	**76**	**92**	634
	51%	**16%**	**7%**	**12%**	**15%**	100%

This survey question with 634 responses showed that **about two-thirds of consumers (67%) had no idea that sulphites and asthma were related,** and only about 27% of those surveyed understood the connection.

Related to this issue is the fact that there are several additives used in food which must carry warnings when they are used in medicines in the EU. Given that medicines are used infrequently and under medical advice, how is it possible that the same additives in our daily food bear no warnings? Or that there is no acceptance in government or industry of their responsibility to educate?

EU health warnings for common food additives when used in medicines

Colourings: E102 (tartrazine); E110 (sunset yellow FCF); E122 (azorubine, carmoisine); E123 (amaranth); E124 (ponceau 4R red, cochineal red A) and E151 (brilliant black BN, black PN). **Warning: May cause allergic reactions.**

Preservatives: E210 (benzoic acid); E211 (sodium benzoate) and E212 (potassium benzoate). **Warning: Mildly irritant to the skin, eyes and mucous membranes**

Preservatives: E220 (sulphur dioxide); E221 (sodium sulphite); E222 (sodium bisulphite); E223 (Sodium metabisulphite); E224 (Potassium metabisulphite) and E228 (Potassium Bisulphite) **Warning: May rarely cause severe hypersensitivity reactions and bronchospasm (difficulty in breathing).**

European Commission Volume 3B Guidelines: excipients in the label and package leaflet of medicinal products for human use July 2003 - http://www.emea.europa.eu/pdfs/human/productinfo/3bc7a_200307en.pdf

In addition, there is a considerable body of scientific knowledge regarding the harmful effects of some food additives that needs to be taken into account in the approvals process (see Attachment D) that appears presently to be ignored. An understanding and acceptance of this body of knowledge would require government to accept some responsibility for informing consumers and industry of possible risks from the use of these additives, and lead to wider use of less harmful alternatives.

Clearly there are discrepancies between countries, between classes of goods that are ingested, and between advice received by governments. The policy objective, however, should be for a logical consistency between these issues and for government to undertake an education role, rather than leaving the role for a not-for-profit voluntary organisation like the Food Intolerance Network and others.

6. Make recommendations to improve food labelling law and policy

In making recommendations, FIN focuses on making Ingredient Panels clear, honest and transparent for consumers.

Industry will complain to government about the extra burden of obtaining the information which we as consumers want, but the reality is that any professional food company already specifies all their ingredients very closely indeed and has this information readily available. This information will include country of origin, all ingredients including those added, and presence/absence of genetic modification. If they do not, then they can scarcely meet the requirements of the Food Standards Code with any confidence.

The food industry will also complain that the sources of their ingredients change on a weekly basis, so they can't be sure what to put on their labels which are printed in advance. Again, they can scarcely meet the requirements of the Food Standards Code with any confidence if they do not specify or know what they are putting in our food.

FIN has experience in this field because we work with many small food companies to improve their ingredient specification. Smaller companies often do not know what or how to specify and are grateful for the free assistance and information; multi-nationals really have no excuse.

To make concrete the recommendations below from FIN, here is an example of a biscuit Ingredient Panel that is current and legal:

INGREDIENTS: wheat flour, vegetable oils, sugar, flavours, milk solids nonfat, tapioca starch, salt, yeast extract, raising agent.

Made in a factory that also processes nuts and soy.

And here is an example of how the same Ingredients Panel would appear if FIN Recommendations (d) to (i) below were accepted:

INGREDIENTS: wheat flour, vegetable oil (canola GM, palm, Malaysia, antioxidant 319), sugar, flavours (colour 102, preservative 211), milk solids nonfat, tapioca starch (Indonesia, contains sulphites), salt, flavour enhancer: yeast extract (621), raising agent (500).

Warnings: colour 102 may have an adverse effect on activity and attention in children. Sulphites are associated with asthma in children

We believe that the second label can be produced without significant extra cost and would provide all the information that consumers want. It would also provide a spur to the food industry to reduce the use of additives known to be harmful.

The Food Intolerance Network makes the following eleven recommendations:

a. So as to restore trust in food labelling, require that food additive approval processes include evidence of no harm on children's health, behaviour and learning. (Attachment E shows a list of symptoms associated with food additives which are not assessed within the current testing and approval regime).

b. So as to restore trust in food labelling, require that food additive approval processes move towards testing additives in combination and in the food environment in which they are used, to lower risks from chemical reactions (e.g. ascorbic acid and benzoate giving rise to the carcinogen benzene) and unexpected synergistic effects (see References, Attachment D).

c. So as to restore trust in food labelling, require that food additive approval evidence is made public, as is required for agricultural and veterinary chemicals and for medicines.

d. Protect Australian and New Zealand consumers to the same extent as those in the EU by

    - removing the 5% labelling loophole and so showing all ingredients, and
    - requiring a warning "may have an adverse effect on activity and attention in children" for food containing the colours Sunset yellow (110), Quinoline yellow (104), Carmoisine (122), Allura red (129), Tartrazine (102) and Ponceau 4R (124).

e. Enable consumer choice by requiring Ingredients Panels to show the country of origin of major ingredients if not from Australia and New Zealand (e.g. pears (China)) and the presence of genetically-modified ingredients (e.g. canola oil (GM)).

f. Require that ingredients that perform functions be labelled as performing those functions, either by using the function (eg flavour enhancer: hydrolysed vegetable protein) or the relevant additive number (e.g. 621 in the previous example).

g. Require that food additives be shown on the Ingredient Panel by number in all cases, with display in words optional.

h. Require that flavours on Ingredient Panels show separately all ingredients beyond those listed in the Flavour and Extract Manufacturers Association Generally Recognised As Safe (GRAS) list (as referenced in Clause 11 of Standard 1.3.1).

i. Discourage the use of generalised and meaningless statements on Ingredient Panels so as to restore some confidence in food labelling.

j. FIN supports the creation of a National Food Authority and the imposition of levies on the food and grocery industry to address critical research, monitoring and surveillance issues.

k. FIN supports actual on-the-ground enforcement of regulation where regulations exist, rather than the failing self-regulation approach.

We believe that implementation of these recommendations would be a very positive step towards clear, honest and transparent information for consumers without increasing the regulatory burden on the food industry.

They would also lead to better physical and mental health, greater well-being and productivity, improved education outcomes and reduced costs for healthcare. This is not simply an issue of consumer choice for the sake of personal preference or ideology, but has a direct effect on many aspects of the Australian economy.

We would also urge that a public consultation process be included in this Labelling Review, with open documentation so that reasons for the final outcomes can be seen.

The Food Intolerance Network thanks the Review Panel for the opportunity to make a submission and stands ready to clarify, detail or justify any issue raised above or to appear before the Panel if required.

Dr Howard Dengate
Co-convenor

With particular assistance from Food Intolerance Network members Dr Annette Cowie, Kathleen Daalmeyer (Additive Education), Sue Dengate, Amanda Ganzenmuller, Anna Hitchcock, Kim Johnstone, David Morrison, Sarah Phillips, Jenny Ravlic (Additive Education), Jo Roberts, Tanya Smith and Maja van Bruggen.