COVER SHEET FOR SUBMISSIONS

REVIEW OF FOOD LABELLING LAW AND POLICY

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Q1. To what extent should the food regulatory system be used to meet broader public health objectives?

The issues paper defines (2.8) public health in only two dimensions, those of acute episodes of ill health and of inhibiting chronic disease through promotion of healthy eating. Thus the paper has defined away the major public health issue of food intolerance reactions caused by foods and by additives which have been approved without adequate testing[1].

Food intolerance reactions by their very nature can be delayed for days and may be cumulative[1]. Royal Prince Alfred Hospital Allergy Unit, world-leaders in this area, point out that food intolerances affect the skin, the airways, the gastrointestinal system and the nervous system. What is NOT chronic about eczema, asthma, IBS and depression? What is NOT a public health issue about these diseases?

The Australia-New Zealand food regulatory system is failing consumers by not addressing this public health issue and so should include this responsibility, as is done to a far greater extent in the EU and UK.

Asthma provides a very clear example: 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[2]. Yet when FIN surveyed public understanding of the link, about two thirds of motivated consumers had no idea of the connection between sulphites and asthma[2]. 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 this FIN survey[2] showed that at least 67% of consumers don't understand why they are highlighted in this manner.

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. Food regulatory action on just this one additive would have profound effects on Australia's very high rate of childhood asthma.

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[1]. 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 would lead to wider use of less harmful alternatives.

There is considerably greater acceptance of responsibility for broader health objectives in the EU and the UK than there is in Australia-New Zealand[3].

This acceptance of responsibility should include the requirement for warnings on ingredient labels about behavioural effects of some artificial colours, considerably lower maximum permitted levels (MPLs) for several food additives that have been shown to be particularly harmful, and abolishing the 5% rule so that ALL additives are shown on the label[3].

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[4]. Given that medicines are used infrequently and under medical advice, how is it acceptable that the same additives in our daily food bear no warnings? Or that there is no acceptance in government or industry of their responsibility in this area?

Q2. What is adequate information and to what extent does such information need to be physically present on the label or be provided through other means (eg education or website)?

The Food Intolerance Network submits that adequate information is, in descending priority order

- Showing ALL ingredients and food additives, with no 5% labelling loophole. This is the situation in EU and the UK.
- Showing food additives on the Ingredient Panel by number in all cases, with display in words optional, so as to reduce use of ingredient names that only a trained chemist can recognise.
- Listing functional ingredients such as flavour enhancers with their number, thus hydrolysed vegetable protein would require the number 621 (monosodium glutamate or MSG) on the Ingredients Panel.
- Requiring a warning “sulphites are associated with asthma in children” for all food containing sulphites (as described and referenced in Q1).
- 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) as is the case in the EU based on sound science (references in Q1).
- Requiring 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).
- Showing the country of origin of major ingredients (say more than 5% by weight) if not from Australia and New Zealand (e.g. pears (China)) and the presence of genetically-modified ingredients (e.g. canola oil (GM)).

FIN submits that this information should be on the label, so that consumers can make a choice at point of sale rather than requiring internet access. Most of this information is provided in the EU and UK and is required on Australian-New Zealand food exported to those places, thus it does not change the regulatory burden on most food industry members.

To expand on the above dot points:

The 5% labelling loophole

Unlike EU Food Standards[3], the current Food Standards Code (FSC) allows Australian and New Zealand food manufacturers to avoid identifying additives in ingredients which constitute 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[5].

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

In their desire 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"; indeed the label may even claim "no MSG" or "no added MSG"! FIN wants to see the number 621 on an Ingredients Panel containing any of the above ingredients.

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.

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.

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 seem entirely implausible (such as a “flavour” that makes up 7% by weight of a rice cake).

Don’t allow the hiding of additives as ingredients, particularly in flavours

Ingredients which perform a technological function in a food need to be identified, not hidden. Thus “hydrolysed vegetable protein” should say “flavour enhancer: hydrolysed vegetable protein from wheat (621)”, which identifies the function and the active regulated food additive. A product which says “cultured whey” (http://www.ingredientexperts.com/content/view/44/76/) or “cultured corn syrup solids” or “whey solids” or “cultured wheat starch” or “cultured wheat flour” should show in the Ingredients Panel eg “preservative: cultured whey (280)”, which identifies the anti-mould function and the presence of the regulated additive propionic acid to which children react.

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[6] and resulted in an industry warning, but it is still widely practised. Manufacturers seem not to be aware of the presence of colours, flavour enhancers and preservatives in some flavour formulations and hence of the need to declare these substances on the label since they are performing a technological function.

Two examples of flavours being used to hide additives

Product labelled “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**), vegetable gum (414), natural flavours (orange oil, freeze-dried orange spray), vegetable oil, and antioxidant (320 butylated hydroxyanisole). * *phrase added*

Icecream including vanilla flavour in the Ingredients Panel
A mother found her son so 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.

Country of origin of foods

Many of our 7,200 members 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.

Q3. How can accurate and consistent labelling be ensured?

FIN submits that honesty can be ensured by having accurate regulations (see discussion in Q2), and then enforcing the regulations consistently.

The present 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 and environmental grounds),
- not showing additives which are present although we know they are technologically required (eg sulphites are usually required 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, (eg “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 mince 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[7].

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, or prosecuted.

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

Another way to encourage accurate labelling is suggested by the FIN Nasty Food Awards which has run on our website for some years, mostly focussed on labels and misleading of consumers[8]. 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, as does the NSW Food Authority for non-compliant restaurants.

Q4. What principles should guide decisions about government intervention on food labelling?

Starting from a primary focus on protection of the consumer (rather than of the food industry), FIN submits that government should be guided by two principles:

- Ensuring 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. The details of FIN's views are covered in Q2.
- 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 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, as detailed in Q3.

Testing: Some food additives can affect health, behaviour and learning in both children and adults[1] 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 which includes behavioural and learning effects.

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”)[9]; 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[1].

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 or motivation to enforce action against the powerful food industry.

Lord Krebs, former head of the UK government's Food Standards Agency was recently reported as saying "When I was head of FSA, there were plenty of cases where the food industry's claims about safety were not borne out" (New Scientist 22 May 2010). FIN asks why do these people wait until they retire before they tell the truth? Is it because government agencies must provide a sunny outlook, no matter what the weather? Is this integrity that we can trust?

Q5. What criteria should determine the appropriate tools for intervention?

The consumer needs to know that what is on the Ingredients Panel is true. Therefore the criteria need to ask whether the information is

- Clear (Is it legible? Is it confusing for non-chemists?),
- Honest (Are ALL ingredients listed? Has there been mislabelling?), and
- Credible (Has sound science and the precautionary principle been applied in approval processes?)

It is inappropriate in labelling to have as a primary principle protection of the food industry when that industry profits by incorrect or misleading labelling which harms consumers.

Q6. Is this a satisfactory spectrum for labelling requirements?

FIN agrees that the Issues Consultation Paper broadly summarises the spectrum for labelling requirements, although again the definition (3.1) of health threats as being “direct and immediate” ignores food intolerance reactions which by their nature can be delayed for days and may be cumulative[1,Q1].

The outstanding issues are

- Removal of the FSC 5% labelling loophole, which, unlike EU Food Standards[3], allows Australian and New Zealand food manufacturers to avoid identifying additives in ingredients which comprise less than 5% of the final food. As the primary consumer organisation focussed on food labels, with over 7,200 members, FIN wants ALL ingredients shown on labels and food additives shown as numbers.
- Extension of mandatory declarations to require a warning “sulphites are associated with asthma in children” for all food containing sulphites (as described and referenced in Q1) and to require 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) as is the case in the EU (references in Q1).

Q7. In what ways could these misunderstandings and disagreements be overcome?

Assuming that this question relates to health safety labelling, feedback from some of our 7,200 members expresses considerable anger at meaningless disclaimers on labels, for instance:

- 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 must (unnecessarily?) avoid 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”.

Is it possible to give food companies a form of legal comfort regarding allergens so that consumers are protected from real threats while the company is not exposed to unnecessary legal actions?

Q8. In what ways can food labelling be used to support health promotion initiatives?

This issue is not a primary one for the Food Intolerance Network.

However FIN supports the Australian Consumers' Association's views 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.

Q9. In what ways can disclosure of ingredients be improved?

It is understood that the focus of this question is on health claims, which is not a primary issue for FIN. We have separately made a detailed case for improved disclosure of ALL ingredients and food additives by number in Q2.

Q10. To what extent should health claims that can be objectively supported by evidence be permitted?

This issue is not a primary one for the Food Intolerance Network.

It is worth noting that many FIN members react to chemicals naturally present in foods, particularly salicylates and biogenic amines, and there are some foods available that now claim to be low in one or other of these classes of chemicals. Obviously we would expect that such claims were backed by evidence and that the food companies could be prosecuted for lying if their claims were not correct. This may require consideration in the framing of regulations in this area.

Q11. What are the practical implications and consequences of aligning the regulations relating to health claims on foods and complementary medicine products?

Our members can be affected by any product that goes in the mouth or on the skin, whether it is a food, medicine or even toothpaste. Under the current system, consumers are mightily confused. From our point of view, aligning regulations to require honest Ingredients Panels on all such products is essential.

Q12. Should specific health warnings (e.g., high level of sodium or saturated fat per serve) and related health consequences be required?

The Food Intolerance Network seeks extension of mandatory declarations to require a warning “sulphites are associated with asthma in children” for all food containing sulphites (as described and referenced in Q1) and to require 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) as is the case in the EU (references in Q1).

Other than these two requests, this issue is not a primary one for the Food Intolerance Network.

Q13. To what extent should the labelling requirements of the Food Standards Code address additional consumer-related concerns, with no immediate public health and safety impact?

Q14. What criteria should be used to determine the inclusion of specific types of information?

As part of an improved culture of care, FIN would be pleased to see consumer concerns more widely discussed and considered for label inclusion where warranted. The “immediacy” of public health and safety impact may not be obvious to regulators, given inadequate testing regimes[1,9,Q4] for additives and limited monitoring after approval. Consumers may in fact be able to assist regulators in identifying emerging impacts if regulators listen.

Many of our 7,200 members 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”, which both fails to identify which ingredients come from which country, and to say which country has supplied the food, is unacceptable. 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.

Therefore FIN suggests that labels show the country of origin of major ingredients (say more than 5% by weight) if not from Australia and New Zealand (e.g. pears (China)) and the presence of genetically-modified ingredients (e.g. canola oil (GM)), as mentioned in Q2.

Other issues, like GM and animal welfare, while important issues for individuals in the Network, are not our primary concern. Nevertheless, given that we live in a democracy, a useful criterion for further public discussion would be that the consumer-related concern is expressed by the majority of people as determined by reliable survey.

For example, Australia already has a situation where free-range eggs are widely sought by consumers and now form the majority of eggs on display in many supermarkets. Yet the standards for these eggs vary from State to State/Territory and the numbers of eggs for sale cannot possibly all come from current free-range producers, meaning that consumers are being deliberately misled[10].

Some recent consumer surveys[11] point to other areas where there is widespread consumer concern that needs attention, particularly the lack of confidence in organisations providing regulation and monitoring of the food supply.

Q15. What criteria should determine which, if any, foods are required to have country of origin labelling?

It is the view of FIN that the present criteria for Country of Origin labelling don't work because of confusion over the terms used and the use of uninformative phases ("made of local and imported ingredients": what else might a food be made from?), although the scope of products covered is adequate.

FIN suggests that Ingredient Panels are the best place to put this information and require that it be specific. Our view is that labels should show the country of origin of major ingredients (say more than 5% by weight) if not from Australia and New Zealand (e.g. pears (China)).

As said before (Q14), a statement 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, and so is unacceptable.

Q16. How can confusion over this terminology in relation to food be resolved?

The problem is that the terms "made" and "produced/product" have no context: is it the packaged food item or the edible portion, or even the packaging itself that is made/produced? We have even found a common belief that "Made in Australia" is a legal description on a can of food where the can is local but all the ingredients are imported.

“Australian grown” or “Grown in Australia” seems to resolve this issue, since that can only be the edible portion being described. Taken with an ingredients label that says where the food comes from, if imported, means that the consumer is fully informed.

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.

Q17. Is there a need to establish agreed definitions of terms such as ‘natural’, ‘lite’, ‘organic’, ‘free range’, ‘virgin’ (as regards olive oil), ‘kosher’ or ‘halal’? If so, should these definitions be included or referenced in the Food Standards Code?

FIN constantly warns people that all these terms are advertising and are not legal descriptions of the food since there is no current reference to them in the FSC. We are aware that there are widely varying standards internationally for some of these terms, so FIN suggests that this issue might be one to be taken up under Codex Alimentarius.

This issue is not a primary one for the Food Intolerance Network.

However FIN supports the Australian Consumers’ Association’s views 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.

Q18. What criteria should be used to determine the legitimacy of such information claims for the food label?

Other issues, like GM, organic standards and animal welfare, while important issues for individuals in the Network, are not FIN's primary concern.

Q19 In what ways can information disclosure about the use of these technological developments in food production be improved given the available state of scientific knowledge, manufacturing processes involved and detection levels?

FIN has a view that the food industry needs to undertake more public engagement on issues such as GM, irradiation and nanotechnology rather than running for cover or remaining silent. FIN would be pleased to see issues of this type more widely discussed and considered for label inclusion where warranted. From the consumers' viewpoint, the "caution [that] needs to be exercised" (3.16) is application of the precautionary principle rather than gung-ho application of new technologies.

Q20. Should alcohol products be regulated as a food? If so, should alcohol products have the same labelling requirements as other foods (i.e., nutrition panels and list of ingredients)? If not, how should alcohol products be regulated?

FIN has been concerned for some years that alcoholic products are not required to list additives, particularly sulphites in beer although sulphites are now listed on wines, albeit without a formal Ingredients Panel. Such products should not, in our view, be exempt from a requirement to list ALL ingredients in a formal Ingredients Panel.

Q21. Should minimum font sizes be specified for all wording?

Many of our 7,200 food intolerant members have been diagnosed with ADHD, have reading and educational problems and belong to lower socio-economic groups. Therefore they have difficulty both with reading labels and with understanding what they are reading. We receive many complaints about illegible labels.

Therefore FIN supports a minimum font size on Ingredient Panels no smaller than current warnings (1.5mm or 3mm depending on package size).

Q22. Are there ways of objectively testing legibility and readability? To what extent should objective testing be required?

FIN is focussed on the Ingredients Panel, where food intolerant people expect to find critical information. Not only does FIN urge a minimum font size, we want ALL additives to be listed by number (with the option of adding, not substituting, words) because numbers are easier to read and less easily confused.

As mentioned in Q21, many of our 7,200 food intolerant members have been diagnosed with ADHD, have reading and educational problems and belong to lower socio-economic groups. Therefore they have difficulty both with reading labels and with understanding what they are reading. We receive many complaints about illegible labels. Therefore FIN believes that information should not be provided for an "average" consumer, but should include those who have reading difficulties.

The education sector can tell you how legibility and readability can be tested. There are reports in the UK that show that half the workforce has a reading age equivalent to a nine-year-old[12].

Q23. How best can the information on food labels be arranged to balance the presentation of a range of information while minimising information overload?

Q24. In what ways can consumers be best informed to maximise their understanding of the terms and figures used on food labels?

Again, FIN is focussed on the Ingredients Panel, where food intolerant people expect to find critical information. In our initial submission[13] FIN gave a concrete example of a current Ingredients Panel and what we want to see as an outcome of this Review:

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.

The same Ingredients Panel if FIN Recommendations are 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 have tested this draft label out on members of our Network and received a positive response, with no complaints of information overload.

Q25. What is an appropriate role for government in relation to use of pictorial icons on food labels?

This issue is not a primary one for the Food Intolerance Network.

Q26. What objectives should inform decisions relevant to the format of front-of-pack labelling?

This issue is not a primary one for the Food Intolerance Network. We support the Australian Consumers' Association viewpoint.

Q27. What is the case for food label information to be provided on foods prepared and consumed in commercial (e.g., restaurants, take away shops) or institutional (schools, pre-schools, worksites) premises? If there is a case, what information would be considered essential?

Many of our 7,200 members are unable to eat food outside the home because they cannot be certain of food ingredients, so this is a major issue for the Food Intolerance Network. The information that we consider essential is the presence/absence of the 50 food additives proven to cause problems by Royal Prince Alfred Hospital[1] and, since members can have allergies as well as food intolerance, the presence of allergens.

One particular issue for those who attempt to eat outside the home is that restaurant staff are often ignorant of food ingredients, being unable for instance to say which foods contain gluten. The catering packs from which much food is prepared often do not have formal Ingredient Panels that staff can access immediately, although such information may be on the internet. FIN urges that formal Ingredient Panels be mandatory on catering packs.

Schools and pre-schools are another difficult area for food intolerance, although becoming less so for those with allergies. Again, FIN members want to be able to know, at point of service, which ingredients are in the food. If this information was legally required on catering packs, schools and pre-schools would be better informed and more able to avoid the additives which cause problems in learning and behaviour for children.

Q28. To what degree should the Food Standards Code address food advertising?

FIN supports the Australian Consumers' Association's views on this issue. 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.

Q29. In what ways can consistency across Australia and New Zealand in the interpretation and administration of food labelling standards be improved?

The National Food Authority suggested in Q31-33 would go a long way towards providing the appropriate and consistent enforcement of labelling requirements for Australia. Food raises national and indeed international issues now and it is no longer appropriate to devolve such responsibilities to local councils as is done in Victoria. Many of FIN's 7,200 members write in disbelief that FSANZ does not have any enforcement powers, particularly those from New Zealand where consistency is better and from those who have tried to lodge a complaint in Australia about mislabelling.

Q30. In what ways can consistency, especially within Australia, in the enforcement of food labelling standards be improved?

The current principle of self-regulation by industry and the use of nebulous GMP (Good Manufacturing Practice) regulation has led 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.

Policy must require actual on-the-ground enforcement of regulation where regulations exist. This requires a single agency and funding as suggested in Q31-33.

Q31. What are the strengths and weaknesses of placing the responsibility for the interpretation, administration and enforcement of labelling standards in Australia with a national authority applying Commonwealth law and with compatible arrangements for New Zealand?

Q32. If such an approach was adopted, what are the strengths and weaknesses of such a national authority being an existing agency; or a specific food labelling agency; or a specific unit within an existing agency?

Q33. If such an approach was adopted, what are appropriate mechanisms to deal with the constitutional limits to the Commonwealth's powers?

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.

FIN supports creation of an Australian National Food Authority with responsibility for both standards and enforcement, including labelling, so as to optimally address the responsibilities of government to protect consumers. These responsibilities should extend, as this Review has discovered, far beyond labelling.

The obvious existing agency within which a labelling function could be expanded is FSANZ, but this will require a huge change in culture. It will be tempting for this Review to conclude that a new labelling unit within FSANZ is the answer, but this will be to ignore an opportunity to fix a broken system[11]. New Zealand has a single food agency that works, and the regulation of agricultural and veterinary chemicals works so much better than does food regulation[14]. Surely there is an opportunity now to learn from these experiences and fix food regulation in Australia.

This National Food Authority can continue to refer, for instance, misleading and deceptive conduct to the ACCC or import label issues to AQIS, while retaining case management responsibility so that consumers do not experience a bureaucratic run-around.

Funding will be an issue. The Australian Food and Grocery Council promotes 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 enforcement, monitoring and indeed 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.

The issue regarding constitutional powers is beyond the knowledge of FIN, but we note that the regulation of agricultural and veterinary chemicals (with mirror legislation in each State/Territory ceding powers to the Commonwealth) demonstrably works well from a consumer point of view and could be investigated as a model.

Q34. What are the advantages and disadvantages of retaining governments' primary responsibility for administering food labelling regulations?

Q35. If a move to either: self regulation by industry of labelling requirements; or co-regulation involving industry, government and consumers were to be considered, how would such an arrangement work and what issues would need to be addressed?

FIN does not support any form of outsourcing of the responsibility for food labelling. While it would be nice for Ministers and bureaucrats to be rid of what is clearly a vexed public issue and be able to blame someone else, we see protection of consumers in this manner as a core government responsibility, albeit one not presently being adequately performed.

The current principle of self-regulation by industry and the use of nebulous GMP (Good Manufacturing Practice) regulation has, in our view, led 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[11]. Self-regulation is unacceptable to FIN in its current or in any future form.

Policy must be for actual on-the-ground enforcement of regulation if regulations exist. This requires a single agency and funding as suggested in response to Q31-33.

Greater input from consumers would be appreciated, but if it follows the format of current Food Regulation Standing Committee stakeholders' meetings FIN would regard it as a waste of time. FIN would be willing to consider genuine co-regulation where consumers have an equal voice at the table.

Again we note that the regulation of agricultural and veterinary chemicals demonstrably works well from a consumer point of view and could be investigated as a model arrangement[14].

Q36. In what ways does such split or shared responsibility strengthen or weaken the interpretation and enforcement of food labelling requirements?

FIN's views are presented in answer to Q31-33. It has seemed peculiar to us for some time that a food standards agency (FSANZ) does not have carriage of food standards in Australia (such as for organic foods) and FIN is aware of duplication of effort and leakage of expertise. This is one area which could be brought under the umbrella of a National Food Authority. Other boundary issues (consumer protection by ACCC etc) can be clarified and negotiated on an agency by agency basis, as has been done for agricultural and veterinary chemicals with some success.

Q37. What are the strengths and limitations of the current processes that define a product as a food or a complementary medicine?

Our members need to know the exact ingredients of any product that goes in the mouth or on the skin, whether a food, medicine or even toothpaste. Under the current system, the labelling on medicines, toiletries, complementary medicines and food are all different and a constant source of confusion and misinformation. FIN would like the same rules to apply to all products. Our members need full disclosure of colours, preservatives, flavours, gluten, lactose and all other ingredients in an honest Ingredients Panel.

It is absurd that medicated cough drops with unlisted colours can sit on a supermarket shelf right next to sweets with a full ingredient list. Additives should also be required to be listed by the same numbers as in foods. Under the current system, food colours may be listed in Consumer Medicine Information with a colour index (CI) number or even a proprietary name such as 'Opadry Blue' which consumers are unable to understand without contacting the manufacturer.

Q38. What are the strengths and weaknesses of having different approaches to the enforcement of food labelling standards for imported versus domestically produced foods?

Q39. Should food imported through New Zealand be subject to the same AQIS inspection requirements?

From a consumer point of view the creation of a National Food Authority (as suggested in response to Q31-33) will provide a single desk where label violations can be reported with an expectation of success. Whether the investigation and prosecution process is outsourced to AQIS for implementation is immaterial. AQIS has logical processes in place for compliance testing and demonstrated experience.

The issue regarding New Zealand is not a primary one for the Food Intolerance Network and has not been raised by members. We support the Australian Consumers' Association viewpoint.

ACKNOWLEDGEMENTS

The Food Intolerance Network is a not-for-profit organisation of over 7,000 members which provides independent information about the effects of food on behaviour, health and learning ability in both children and adults, and support for families using a low-chemical elimination diet free of additives, low in salicylates, amines and flavour enhancers (FAILSAFE) for health, behaviour and learning problems. The Network receives no government or industry funding.

This submission required more than 50 hours of volunteer time and the assistance of Food Intolerance Network members is gratefully acknowledged: Kathy Clarke, Dr Annette Cowie, Kathleen Daalmeyer (Additive Education), Sue Dengate, Clare Harris, Anna Hitchcock, Brenda Hunting, Emma Johnson, Eliza and Nathan Mearns, David Morrison, Mel Nielson, Dr Alison Payne, Dr Vera Pennisi, Sarah Phillips, Bronwyn Pollnitz, Jenny Ravlic (Additive Education), Jo Roberts, Sheryl Sibley, Tanya Smith, Maja van Bruggen and Dr Alison Walsh.

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1. **Four key references on food intolerance:**

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Swain A, Soutter V, Loblay R, Truswell AS. Salicylates, oligoantigenic diets, and behaviour. Lancet. 1985;2(8445):41-2.

McCann D et al. Food additives and hyperactive behaviour in 3-year-old and 8/9-year-old children in the community: a randomised, double-blinded, placebo-controlled trial. Lancet. 2007;370(9598):1560-7. http://www.precaution.org/lib/food_additives_and_hyperactivity.070906.pdf.

Many further references can be found at http://www.fedupwithfoodadditives.info/information/references.htm

FSANZ approval of additives without scientific evidence

The Freedom of Information process used to reveal a total lack of the required science for two additives of concern is detailed at http://www.fedupwithfoodadditives.info/features/FOI/FOI.htm. FSANZ eventually admitted "that these documents do not exist" and then, later in the same letter "currently available toxicological data supports the safe use of propionic acid ….and ribonucleotides" but were unable to produce that data we had requested. Apparently, like Schrodinger's cat, the data both exists and does not exist.

2. **Asthma and sulphites**

World Health Organisation - Fifty-first meeting of the Joint FAO/WHO Expert Committee on Food Additives. Safety Evaluation of sulfur dioxide and sulfites and addendum, Geneva: World Health Organisation, 1999, A recent WHO report which concluded that 20-30% of asthmatic children are sensitive to sulphites - upgraded from the previous WHO, FDA and NAC estimate that less than 5% of asthmatics were sulphite sensitive. http://www.inchem.org/documents/jecfa/jecmono/v042je06.htm

Towns SJ, Mellis CM. Role of acetyl salicylic acid and sodium metabisulfite in chronic childhood asthma. Pediatrics 1984;73(5):631-7. This paper found more than 65 per cent of asthmatic children were sulphite sensitive

Food Intolerance Network survey

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.

More references at http://www.fedupwithfoodadditives.info/factsheets/Factsulphites.htm

3. Culture of care EU versus Australia-New Zealand

Artificial colours: In July 2008, the European Parliament voted in favour of labelling foods containing the six food colours E110, E104, E122, E129, E102 and E124 with the words "may have an adverse effect on activity and attention in children", http://www.europarl.europa.eu/news/expert/infopress_page/067-33565-189-07-28-911-20080707IPR33563-07-07-2008-2008-false/default_en.htm

Lower MPLs: There are considerable disparities between the levels of some additives permitted in the UK and those in Australia, with usually the UK being far lower. This is marked for sulphites, where levels in biscuits in the UK are 1/6th those in Australia, in gelatine 1/15th, in candied or glace fruit are 1/20th. Even simple dried fruit are at 2000mg/kg in the UK and 3000mg/kg in Australia. The permitted level of benzoates in water-based flavoured drinks is nearly 1/3rd in the UK compared with Australia. Clearly Australia has some of the highest levels used anywhere in the world.

PERMITTED ADDITIVE LEVELS in mg/kg

	Australia – NZ	UK
Sulphites		
Dry biscuit	300	50
Glucose syrup	450	20
Sausages	500	450
Gelatine	750	50
Candied, crystallised or glace fruit	2000	100
Dried fruit	3000	2000
Benzoates		
Water-based flavoured drinks	400	150
Fruit wine	400	0

Low-sugar jams and jellies	1000	500
Propionates		
Sliced bread	4000	3000
Bread rolls	4000	1000

Source: http://www.opsi.gov.uk/si/si1995/Uksi_19953187_en_4.htm and Australian Food Standards Code.

5% rule abolished

In the EU, the comparable '25% rule' was abolished in 2004 meaning that virtually all ingredients must be labelled. http://www.foodstandards.gov.uk/news/pressreleases/2004/jun/allergenlabellingpress

4. **Health warnings**

In the EU, various health warnings are required if the following additives are used in medication.

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).

Ref: European Commission Volume 3B Guidelines: excipients in the label and package leaflet of medicinal products for human use July 2003 http://www.foodcomm.org.uk/PDF%20files/EU_guidelines.pdf .

5. **Complaints about labelling to FSANZ**

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.

6. **Use of flavours as vehicles for other ingredients without declaration**

http://www.fedupwithfoodadditives.info/support/FSflavours.pdf

7. **Sulphites in mince**

Full details are available at http://www.fedupwithfoodadditives.info/features/sulphites/sulphites.htm and http://www.fedupwithfoodadditives.info/factsheets/Factsulphites.htm.

8. **Name and shame for labels**

http://www.fedupwithfoodadditives.info/extras/NASTY%20FOOD%20AWARDS.htm

9. **Synergistic effects of additives used in combination**

Lau K, McLean WG, Williams DP, Howard CV. Synergistic interactions between commonly used food additives in a developmental neurotoxicity test. Toxicol Sci. 2006;90(1):178-87.
Exposure to non-nutritional food additives during the critical development window has been implicated in the induction and severity of behavioral disorders such as attention deficit hyperactivity disorder (ADHD). Although the use of single food additives at their regulated concentrations is believed to be relatively safe in terms of neuronal development, their combined effects remain unclear. We therefore examined the neurotoxic effects of four common food additives in combinations of two (Brilliant Blue and L-glutamic acid, Quinoline Yellow and aspartame) to assess potential interactions. Mouse NB2a neuroblastoma cells were induced to differentiate and grow neurites in the presence of additives. After 24 h, cells were fixed and stained and neurite length measured by light microscopy with computerized image analysis. Neurotoxicity was measured as an inhibition of neurite outgrowth. Two independent models were used to analyze combination effects: effect additivity and dose additivity. Significant synergy was observed between combinations of Brilliant Blue with L-glutamic acid, and Quinoline Yellow with aspartame, in both models. Involvement of N-methyl-D-aspartate (NMDA) receptors in food additive-induced neurite inhibition was assessed with a NMDA antagonist, CNS-1102. L-glutamic acid- and aspartame-induced neurotoxicity was reduced in the presence of CNS-1102; however, the antagonist did not prevent food color-induced neurotoxicity. Theoretical exposure to additives was calculated based on analysis of content in foodstuff, and estimated percentage absorption from the gut. Inhibition of neurite outgrowth was found at concentrations of additives theoretically achievable in plasma by ingestion of a typical snack and drink. In addition, Trypan Blue dye exclusion was used to evaluate the cellular toxicity of food additives on cell viability of NB2a cells; both combinations had a straightforward additive effect on cytotoxicity. These data have implications for the cellular effects of common chemical entities ingested individually and in combination.

10. **Free-range eggs**

http://www.johnkaye.org.au/media/free-range-egg-consumers-taken-for-a-ride

11. **Consumer-related concerns**

Three surveys show clearly that some consumer-related concerns are shared by the clear majority of consumers and are not, in fact, the minority view regulators would have us believe http://www.fedupwithfoodadditives.info/support/FINlabelattachment01.pdf (attachments A, B & 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).

12. **Average reading age in the UK**

The average reading age of people in the UK was equivalent to an educated nine-year-old but a reading age of 16 is required to understand many health websites. http://news.bbc.co.uk/2/hi/health/3641634.stm.

Up to 16 million adults - nearly half the workforce - are holding down jobs despite having the reading and writing skills expected of children leaving primary school, a new report reveals today.
http://www.guardian.co.uk/uk/2006/jan/24/books.politics

13. **Initial submission from FIN to Review of food labelling law and policy**

http://www.fedupwithfoodadditives.info/support/FINlabelsubmission01.pdf (November 2009)

14. **Agricultural and veterinary chemicals administration in Australia**

See how much better the agvet chemical regulators talk to consumers: http://www.apvma.gov.au/