

This submission is provided by Allergy & Anaphylaxis Australia to the Productivity Commission Review of the Regulation of Agriculture in response to the draft report issued by the Commission on 21 July 2016.

Allergy & Anaphylaxis Australia, the peak consumer body for allergic consumers in Australia would like to make the following submission with regards to the proposed changes to “gluten free” labelling.

The proposed draft recommendation 9.2 only recognises those with coeliac disease, not those individuals at-risk of anaphylaxis to wheat and other grains who also rely on “gluten-free” labelling to identify the presence of gluten in the foods they purchase.

For wheat allergic consumers it is important that foods labelled as gluten free are absolutely gluten free and do not have small amounts or traces of gluten that someone with Coeliac disease or a gluten intolerance may be able to consume without adverse effect. Please note there is no definition of a ‘trace’ amount of a food so this amount differs from manufacturer to manufacturer. Small amounts of gluten can cause life-threatening anaphylaxis in wheat allergic individuals.

The current Food Standards Regulations allows for manufacturers to make a low gluten claim which may be suitable for consumers who aren’t allergic, but have an intolerance or a preference not to have gluten in their diet. The term of ‘low gluten’ also affords those with a true wheat allergy to make a choice to prevent a potentially life threatening allergic reaction. Any changes to the current regulations on gluten free foods are strongly opposed in the interests of individuals with wheat allergy.

Yours sincerely,

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