

I wish to register my concerns about food labelling in Australia and request that proposed changes to the food labelling provisions in this country be amended to include the following changes:

## **FOOD ADDITIVES**

### ***Genetically modified content***

I request that the food labelling review ensures that ALL genetically modified content is clearly disclosed on labels and by suppliers to enable consumers to exercise informed choice. Currently oils, sugars and starches from GM crops, products from animals fed GM food, GM additives, processing aids and flavourings; and food from street vendors, takeaways and restaurants do not need to be labelled and I request that the regulations are amended so that consumers know whether what they are intending to consume contains GM derived ingredients and so make an informed choice whether to purchase the product or not.

***Declare all food additives.*** There currently exists a 5% loophole in our food standards code in relation to food additives, whereby if an ingredient comprises less than 5% of a food product then the food additives in that ingredient do not have to be declared on the label.

Many consumers wish to avoid certain food additives which are often not disclosed on the labels under this loophole. I request that the food labelling review ensure that this 5% loophole is removed and that the new legislation requires manufacturers to declare the presence of ALL food additives in products, no matter how small the quantity, to enable consumers to exercise informed choice.

### ***Warning labels for harmful colours***

As a result of the 2007 Southampton study into the effect of some food colours on children's behaviour, the EU has introduced legislation, effective July 2010, requiring any products which continue to use the artificial colours 102, 110, 122, 124 129 to carry a warning label. To ensure that Australian consumers enjoy the same level of protection as EU consumers, I request the food labelling review to ensure that Australian products using the above 6 colours be required to carry a warning label advising consumers that these additives may have an adverse effect on attention and behaviour in some children.

### ***Nanoparticles***

I request that products with ANY nanotechnology component be fully disclosed on the labelling also to ensure consumers can exercise informed choice.

***No undeclared ingredients***

Currently some ingredients do not have to be listed or a vague description is allowed e.g. 'spices' or 'vegetable oil'. I request that the food labelling review ensures that all ingredients be accurately identified and listed on a product regardless of the proportion they form of the product e.g. if you are allergic to a substance, irrespective of the amount in the product, it can still cause an allergic response so consumers need to know all the contents of what they are purchasing. Generic descriptions such as vegetable oil are not helpful to consumers who wish for example to avoid palm oil for ethical reasons or canola oil because of the likelihood of it being GM canola or contaminated with GM canola.

Yours sincerely,

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