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## Fonterra Co-operative Group Limited Submission on:

# FSANZ P1031 Proposed Allergen Labelling Exemptions 23 September 2015

## Fonterra Co-operative Group Limited

Fonterra is a leading global dairy nutrition business, owned by 10,500 New Zealand (NZ) farmer shareholders. Fonterra is the world's leading exporter of dairy products and a preferred supplier of dairy ingredients to many of the world's leading food companies.

Employing more than 18,000 people worldwide, Fonterra is NZ's largest company involved in large-scale milk procurement, processing and management, with a supply chain spanning more than 140 countries.

Fonterra is also a market leader in the consumer dairy segment with a portfolio of milk, cheese, butter and spreads, ice cream and yoghurt brands in Australia and New Zealand. Some of our consumer brands include Anchor, Bega, Fresh n' Fruity, Kapiti, Mainland, Perfect Italiano, , Tip Top and Western Star. Fonterra also operates a dedicated sales channel for the foodservice industry which services restaurants, cafes, hotels and fast food operations.

Food safety and quality, and innovation are priorities to every part of Fonterra. Through its state-of-the-art research facilities in Palmerston North, New Zealand and Melbourne, Australia, and its global network of research and development facilities, Fonterra is a leader in dairy science and innovation. Fonterra products are synonymous with innovation in bone health, maternal health, child and infant nutrition and dairy goodness. Fonterra products and ingredients are found in many types of manufactured food products, pharmaceuticals, foodservice outlets including bakeries, restaurants and hotels, and homes around the world.

## General Comments

- Fonterra is supportive of the proposal to exempt certain foods and ingredients derived from allergenic foods from mandatory allergen declarations where evidence indicates the production methods used remove or reduce allergenic proteins to levels that are of negligible risk to allergenic consumers.

- Specifically, Fonterra is supportive of an evidence based, risk analysis approach in dealing with allergen labelling exemptions, and alignment with international standards. Such an approach will increase the choice of foods to allergic populations safely, and support harmonisation with international standards facilitating global trade.
- We note there is a difference in the FSANZ suggested maximum level of gluten for glucose syrups from wheat starch at  $\leq 10\text{mg/kg}$  for exemption from allergen labelling declaration when compared to the gluten-free definition for foods specifically processed to remove gluten, including wheat, as prescribed by Codex Stan 118-1979 (Amendment 2015) and EC No 41/2009 at  $< 20\text{mg/kg}$ .

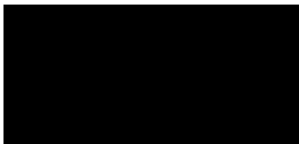
If there are any queries relating to this submission, please contact;



Regulatory Affairs and Nutrition Specialist  
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Yours faithfully,



GM Regulatory Advocacy  
Food Safety, Quality and Regulatory Affairs