

22 July 2024

*Allergy & Anaphylaxis Australia (A&AA) support the use of ED05-based RfDs rather than the more stringent ED01, as the increased threshold will provide more choice to consumers with minimal impact on the risk to public health.*

*We accept that thresholds are based on levels agreed by the Expert Committee but suggest that they do need review at points in time when more data may become available. This is likely to occur with the high number of oral food challenges that are being undertaken in controlled settings. In addition, the National Allergy Council in Australia is working with government and key stakeholders to create an anaphylaxis reporting system, so it is likely that we will have more information on people that are having anaphylaxis. This will allow us to monitor this space once we move to ED05.*

*A&AA strongly support PAL education/information programs for consumers, health professionals and all food business staff.*

*The experience of A&AA is that many consumers ignore precautionary allergen labelling (PAL) statements because:*

- They are voluntary and a product without a PAL statement may be more of a risk than a product with a PAL statement.*
- Some manufacturers have a PAL statement on all products, including products that pose very little risk to consumers.*
- There is nothing on pack indicating why a PAL has been added or not included/removed.*
- Many packaged foods, even those with single ingredients eg. black beans, have a PAL, so food choices are very restricted, even when cooking with basic ingredients.*
- They have been advised to ignore PAL statements by their treating doctor or dietitian because of the mistaken belief that manufacturers use a PAL to 'protect themselves from litigation'. This is true in some cases.*

*There is a general lack of understanding that the intention of PAL is to communicate risk of cross-contact/contamination in the production of packaged foods.*

*Ignoring all PAL statements can increase the risk of allergic reactions, including anaphylaxis.*

*If PAL is to be meaningful, accurate and effective, it is critical that a process to label with or without a PAL is mandated and important that education /messaging for all (consumers, health professionals, food manufacturers, importers etc) is consistent and easy to understand.*