



Minister for Health

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13 SEP 2004

Dr Howard Dengate
Food Intolerance Network
PO Box 718
WOOLLOOLGA NSW 2456

Dear Dr Dengate

Thank you for your letter of 2 July 2004 concerning the lack of scientific evidence for certain food additives.

I understand you have written with the same concerns to the Commonwealth Minister for Health and Aging, the Commonwealth Parliamentary Secretary to the Minister for Health and Aging and every State and Territory Health Minister. I endorse the response provided to you by the Commonwealth Department of Health and Aging.

In order for food additives to be approved for inclusion in the Food Standards Code it is necessary for the risk assessment to find that the approval will not result in an unacceptable risk to health. One of the purposes of the requirement for all packaged food to be labelled with all ingredients is to inform consumers who may be intolerant or allergic to a particular ingredient of the presence of that ingredient in order that they may avoid inadvertent consumption. On this basis the process undertaken by FSANZ to assess risk is considered adequate.

If you have any further queries on this matter please contact Mr Victor Di Paola on 9637 4893.

Yours sincerely

Hon Bronwyn Pike MP
Minister for Health



NEW SOUTH WALES

MINISTER FOR PRIMARY INDUSTRIES

MPI04/3552
MA04/588

16 SEP 2004

Dr Howard Dengate FAICD
Food Intolerance Network
PO Box 718
WOOLGOOLA NSW 2456

Dear Dr Dengate

I refer to your letter of 2 July 2004 to the Hon Morris Iemma, MP, Minister for Health, regarding the lack of scientific evidence for certain food additives. Your letter has been referred to me as the issues raised fall within my area of responsibility.

The NSW Food Authority advised that you have written in identical terms to the relevant Commonwealth Ministers, and I have had the benefit of viewing the reply prepared by the Department of Health and Ageing. I do not propose to reiterate the advice that has already been supplied to you by the Department.

New South Wales, in common with other States and Territories, is a signatory to the Food Regulation Agreement 2002. The agreement facilitates the development and adoption of the Food Standards Code which in NSW is administered and enforced under the *Food Act 2003* by the NSW Food Authority. I have complete confidence in this process, including the evaluation of food additives for their safety in use.

In addition I am aware that the safety of both food and food additives is a matter where vigilance is required, and I am confident that Food Standards Australia New Zealand keeps such matters under continual review. I am also aware that there is a wide range of food, food components and food additives to which certain individuals can demonstrate sensitivity when exposed to them. I accept that adequate and truthful labelling is the appropriate way of alerting such individuals, and believe the Food Standards Code substantially addresses this issue. However, if you consider that there is scope for improving the quality of information made available to the public, I would be pleased to hear any constructive suggestions.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ian Macdonald'.

IAN MACDONALD MLC
NSW MINISTER FOR PRIMARY INDUSTRIES



Gordon Nuttall MP
Member for Sandgate



22 SEP 2004
MI122374

Minister for Health

Dr H Dengate
Food Intolerance Network
PO Box 718
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Dear Dr Dengate

Thank you for your letter dated 2 July 2004, regarding scientific evidence for certain food additives currently approved for use in the *Australian New Zealand Food Standards Code*.

Safety assessment of foods and food additives

Food sold in Australia must comply with the food standards that are contained in the *Australian New Zealand Food Standards Code*. Food Standards Australia New Zealand (FSANZ) is an independent food standard setting body whose role is to develop and maintain these standards, which are enforced by Queensland the other State/Territory and New Zealand food authorities. Imported food must also comply with these food standards.

All new food additives undergo a rigorous safety assessment by FSANZ and an assessment of whether the food additive is actually needed in the production of food. Provided that the FSANZ Board agrees that the food additive is safe and technologically justified, a notification is made to the Australia New Zealand Food Regulation Ministerial Council (consisting of Health Ministers from the State /Territory, Australian and New Zealand Governments) informing them of the FSANZ Board's decision on that particular food additive. If the Ministers accept the notification, an amendment to the Code is gazetted and it is only then that it is legal to use that particular food additive in Australia and New Zealand.

The most important objective in establishing food standards is maintaining public health and safety in order that consumers can have confidence that the food they eat is safe. For a food additive to be approved for use in Australia and New Zealand it must be established that:

- (1) it will not pose an unacceptable risk to health when used in amounts up to the approved limits even after a lifetime of consumption;
- (2) it will provide a benefit to consumers; and
- (3) it will only be used up to a level commensurate with the function that the additive performs in the food.

The safety of food additives is constantly under review by such bodies as the Joint FAO/WHO Expert Committee on Food Additives (JECFA), the United States Food and Drug Administration and here in Australia by FSANZ. During these reviews, consideration is given to all available data relevant to the safety of the particular food additive, including metabolic data, toxicological data from animal studies, and any data from human studies.

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For most additives, an acceptable daily intake (ADI) is established based on the evaluation of these data. The ADI is the amount of a substance (eg a food additive) that can be ingested daily, by humans, for an entire lifetime without appreciable health risk. For some food additives, their use is restricted in order to ensure that the dietary intake is below the ADI. Food additives evaluated in this way have historically been shown to be safe for the vast majority of the population.

Safety assessment of propionates and ribonucleotides

In regard to your specific concerns about the approvals for propionates (280-283) and ribonucleotides (627, 631 and 635) which are both naturally occurring metabolites, these food additives have been evaluated by JECFA on several occasions and have been used safely in food products in Australia and a number of other countries for many years.

These two groups of additives, when evaluated by JECFA, were given an ADI of "not limited" – this non-numerical ADI is given to a substance of very low toxicity which would not be expected to lead to any adverse health effects from its use at the levels necessary to achieve its technological function. A comprehensive list of approved food additives are available on the JECFA website (<http://apps3.fao.org/jecfa>).

However, it is recognised that there may be a small number of individuals who are particularly sensitive to certain chemicals, including some food additives, leading to adverse health outcomes and, in some cases, behavioural changes. Identifying these individuals and then characterising and quantifying their response to food additives is extremely difficult. In general, reporting of sensitivity to food additives is anecdotal. While chemical sensitivity is claimed by some to be widespread, there is little evidence from medical establishments such as allergy clinics that this is the case.

Food standards are one tool to manage public health issues in relation to food but on their own cannot guarantee a risk-free food supply for all members of the population. Many other factors can influence public health outcomes, such as ongoing education of consumers in relation to nutrition, and providing adequate information to allow consumers to make healthy food choices. Individuals who have food intolerances should be properly diagnosed by a health professional and advised by experts in the field of food allergy and food intolerance as to the types of foods they should include in their diet.

In order to enable consumers to make informed choices in relation to food, food additives and ingredients are required to be identified on the food label. This enables consumers to avoid particular food additives, if necessary. Organisations such as the Food Intolerance Network can play a leading role in helping people with food intolerance by showing them how to use food labels effectively.

I am advised that FSANZ continues to monitor developments in relation to potential adverse effects associated with food additives and is happy to work with individuals and groups, to improve public health outcomes.

Thank you for bringing this matter to my attention and I trust this information is of assistance.

Yours sincerely



GORDON NUTTALL MP
Minister for Health
Member for Sandgate



MINISTER FOR HEALTH

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Dear Dr Dengate

Thank you for your letter of 2 July 2004 informing me of your concerns regarding the evidence held by Food Standards Australia New Zealand (FSANZ) on two groups of food additives: propionates and ribonucleotides.

As you are aware, FSANZ must follow a statutory process in determining whether or not an amendment or addition should be made to the Food Standards Code. This process is rigorous and transparent in that two rounds of public consultation are undertaken before a recommendation is made to the FSANZ Board, which in turn, informs the Australian Food Regulation Ministerial Council of its decision. If Ministers do have a concern with a standard, a review can be requested.

I have requested officers of the Department of Health and Community Services to discuss this matter thoroughly with their interstate counterparts through both the Food Regulation Standing Committee and the Implementation Sub-Committee.

Thank you for bringing this matter to my attention and I congratulate both yourself and Mrs Dengate for the level of commitment that you have both shown in leading the Food Intolerance Network.

Yours sincerely

PETER TOYNE

07 OCT 2004

