



Food Intolerance Network

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Mr Graham Peachey
Chief Executive Officer
Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

Application A555 Initial Assessment Report: Declaration of Antioxidants in Fats and Oils

On behalf of the 4,500 members of the Food Intolerance Network, I am writing to formally withdraw our above application. This is because my meeting with your Food Standards staff on 27 November 2006 made it clear that without further scientific evidence our application would be unsuccessful. Further scientific evidence is likely to emerge from studies now underway at Latrobe University and in the USA, but will take time.

I regret the necessity for this withdrawal since, as our application made clear, the single simple change requested would have meant a huge drop in the number of complaints that we and the food industry have to deal with and would have removed a major source of uncertainty and a health threat for consumers.

In withdrawing the application, there are two comments I must make:

First, your stated requirement for us to produce double-blind placebo-controlled (DBPC) scientific studies to justify change, places you in a scientifically untenable position. I challenge you to produce just one positive DBPC study to justify your initial approval of these synthetic antioxidants, particularly one which includes behavioural criteria and tests on children. In other words, I believe that FSANZ have used one less-than-scientific standard for initial approval of these chemicals and set another for any amendment of that approval, which is scientifically dishonest. In any case, I do not believe that any scientific evidence is required: all we want is for manufacturers to tell us what they already know is in their food. That's all, and your Act has the power to do this without further scientific evidence.

Second, I wish to make a prediction that even when we return with the evidence you say you need, FSANZ will not make any changes. I base this assertion on our experience with propionate preservatives used in bread, where in 1995 FSANZ ignored complaints and insisted on DBPC study. When our Network undertook the research, funded by the community, and published the results in the Journal of Paediatrics and Child Health in 2002, FSANZ took no action whatsoever. The fact that propionates are largely removed from Australian bread is entirely due to our public awareness and consumer advocacy activities, not to FSANZ properly undertaking its public health role for which it is supposedly funded. The continual churning of generalist staff through FSANZ also means that there will be no corporate memory or responsibility for acting on this information when it is provided.

When we express concerns about the health, behaviour and learning effects of particular food additives, Ministers and FSANZ often tell us as consumers that we can read the label and make informed decisions about the foods we buy. But without the transparent and complete labelling requirements which we requested in this application, we as consumers are in fact denied this basic right.

Yours faithfully

Howard Dengate BSc PhD FAICD