



12 December 2023

Food Standards Australia New Zealand
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KINGSTON ACT 2604
by email submissions@foodstandards.gov.au

A1254 Rosemary extract as a food additive - extension of use

I wish to make comment on this Application on behalf of the Food Intolerance Network (FIN), which with 21,000 current members is probably the largest consumer organisation focused on food in Australia.

We rarely comment these days on FSANZ calls for submissions, because in over 30 years of lobbying we have never had any impact and usually not even the courtesy of a reply of any sort. In particular, I note that our 2018 submission on the same additive Rosemary Extract (E392) (attached) was never even acknowledged in any way despite raising genuine legal and scientific questions for members of FIN. This is how we expect FSANZ to treat consumers.

Many of our members have reported reacting to this additive as it is very high in chemicals resembling salicylates, which are used as markers for a wide range of chemicals made by plants to protect themselves from attack.

While the FSANZ Risk and Technical Assessment says it is based on safety and dietary exposure assessments, there is in fact no new research evidence presented since 2018 and, so far as I can judge, the temporary ADI that will be "withdrawn at the end of 2018 if more scientific evidence is not forthcoming" remains unsupported by new evidence other than desktop population assessments of intake in the general population. So the requested extension of use is based on the old rat studies on developmental or reproductive toxicity plus guesses as to how much people might eat.

Once again, food regulators' narrow definition of food safety leaves consumers exposed in my view. We recommend that food intolerant people avoid foods containing this additive.

Regards

A handwritten signature in black ink, appearing to read "U. D. Jones". The signature is written in a cursive style with a large, prominent loop at the end.

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www.fedup.com.au The Food Intolerance Network provides independent information about the effects of food on behaviour, health and learning in both children and adults, and support for families using a low-chemical elimination diet free of additives, low in salicylates, amines and flavour enhancers (FAILSAFE) for health, behaviour and learning problems. ABN 72 705 112 854