

# FOOD INTOLERANCE NETWORK



18 April 2011

Steve McCutcheon  
Chief Executive Officer  
Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610

Dear Steve

The desire of the food industry for “clean labels” which appear to address consumer concerns is becoming a growing problem, with deliberate deception unchecked by government regulators. I provide examples below of recent food industry practice to hide functional additives simply as ingredients while making misleading claims in other advertising.

On behalf of the 8,000 family Food Intolerance Network I wish to lodge a formal complaint about this growing practice and ask for the efforts of your organisation to stamp it out.

## Glutamates

There is a growing industry practice to hide the flavour enhancer MSG (monosodium glutamate 621) as a natural-appearing ingredient on the label so as to mislead customers. The intention to deliberately mislead is clear from other wording on the packaging, some of which is legally very dubious.

Here are just four examples:

1. **Zed Snack Food Company's Dip Stix Sweet Chili and Lime (a soy snack):** Ingredients: Wheat Starch, Sunola Sunflower Oil, Soyabean Solids 18%, Sugar, Chili and lime flavour (Sugar, Salt, Paprika, Chili, **Vegetable powder**, **Hydrolysed vegetable protein** (from soy), Rice flour, Lime juice powder, Natural flavour, Food acid (262, 330), **Yeast extract**, Free flow agent (551), Flavour enhancer (635)), Onion, Malt extract (from barley), **Soy sauce powder** (from soya bean, wheat flour), Garlic, Chives.

PO Box 718, Woolgoolga NSW 2456. Ph 02 6654 7500, [confednet@ozemail.com.au](mailto:confednet@ozemail.com.au)

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The Food Intolerance Network provides independent information about the effects of food on behaviour, health and learning ability 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.

This product advertises "No Added MSG" when among the ingredients are three sources of glutamate: hydrolysed vegetable protein (a major source of glutamates), yeast extract (a major source of glutamates), and soy sauce powder (also a major source of glutamates).

The product also contains flavour enhancer 635, which is a mixture of 627 and 631 added to boost the effects of MSG 10-15 times (Sommer R. Yeast extracts: Production, properties and components, paper presented at the 9th International Symposium on Yeasts, Sydney, 1996). There is no point in using this flavour enhancer unless there is a source of glutamates and, to add insult to injury, there is the technically correct but egregious claim at the end of the Ingredients Panel that "Flavour enhancer 635 is not MSG".

- 2. Healthieries Potato Stix: Roast Potato:** Potato stix (potato powder (46%), rice flour (21%), wheat flour), vegetable oil (palm), potato flavour (7%) [maltodextrin, salt, powdered dehydrated vegetables (onion, garlic), **yeast extract**, mineral salt (potassium chloride), **flavours (natural, nature identical)**, herbs, spices, anti-caking agent (silicon dioxide), sucrose, acidity regulators (lactic acid, calcium lactate)]. **Chicken Flavour:** Potato stix (potato powder (46%), rice flour (21%), wheat flour), vegetable oil (palm), chicken flavour (6.49%) [maltodextrin, salt, powdered dehydrated vegetables (onion, garlic), **yeast extract**, dextrose, **hydrolysed vegetable protein**, mineral salt (potassium chloride), sucrose, herbs, spices, anti-caking agent (silicon dioxide), flavour (natural), acidity regulators (succinic acid, citric acid), vegetable oil (palm)]. **Salt & Vinegar:** Potato stix [potato powder (46%), rice flour (21%), wheat flour], vegetable oil (palm), salt and vinegar flavour (6.49%) [starch, acidity regulator (sodium acetate), salt, mineral salt (potassium chloride), **flavour (natural and nature identical)**, anticaking agent (silicon dioxide)].

The packaging claims, among other things that the product is "MSG free", however two of these products contain yeast extract (a major source of glutamates) and one contains hydrolysed vegetable protein (another major source of glutamates).

We also have leaked industry information that the natural and nature-identical flavours in some products contain glutamates, although we have no evidence that this is the case with this particular product. Who would know, since there is no regulatory testing for glutamates?

To add to the deception, the Healthieries website (31/03/2011) claims these products are "ideal" "**for those who have intolerances to MSG** [my emphasis], artificial flavourings and colourings" which is clearly wrong since there are glutamates in at least two of the products.

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3. **Healtheries Rice Wheels: Cheese Flavour:** Rice (85%), Cheese Flavour (7%) (**Natural and Nature Identical Flavouring Substances**, Whey and Milk Powder, Salt, Sugar, Starches, Anti-Caking Agent (551), Vegetable Oil (Palm), Emulsifier (339), Mineral Salt (331), Thickeners (414, 415)), Canola Oil (Antioxidant (307)), Salt, Garlic Powder, Soy Lecithin. **Roast Chicken Flavour:** Rice (85%), Roast Chicken Flavour (7%) (**Natural and Nature Identical Flavouring Substances**, Starch, Dextrose, Whey Powder, Sugar, **Yeast**, Cellulose, Anti-Caking Agent (551), Gum Arabic, Vegetable Oil, Antioxidant (Alpha-tocopherol)), Canola Oil (Antioxidant (307)), Salt, Garlic Powder, Soy Lecithin. **Burger Flavour:** Puffed rice (81%) [rice, salt, garlic powder, emulsifier (soy lecithin)], burger flavour (10%) [maltodextrin, sugar, **hydrolysed vegetable protein**, acidity regulators (sodium acetate, citric acid), burger flavour, vegetable powders (onion, garlic), **yeast extract**, spices, anti-caking agent (silicon dioxide), salt, vegetable oil], canola oil [antioxidant (307)]. **Barbeque Flavour:** Rice (85%), Barbecue Flavour (7%) (**Natural and Nature Identical Flavouring Substances**, Spices, Vegetable Powder (Onion, Garlic, Tomato), Sugar, Salt, **Yeast**, Anti-Caking Agents (551,554), Starches, Vegetable Oil (Soy, Sunflower, Cottonseed)), Canola Oil (Antioxidant (307)), Salt, Garlic Powder, Soy Lecithin.

The packaging for all flavours claims that the product contains no artificial flavours and colours, wheat, gluten, yeast, **added** [my emphasis] monosodium glutamate (MSG), yet every product contains very high levels of natural and nature-identical flavours that may be being used as vehicles for undeclared forms of glutamate (although we have no evidence that this is the case with these particular products) and two of the products contain yeast or yeast extract (a major source of glutamates) and hydrolysed vegetable protein (another major source of glutamates).

Again, to add to the deception, the Healtheries website (31/03/2011) claims these products are “ideal” “**for those who have intolerances to MSG** [my emphasis], artificial flavourings and colourings”, which is clearly wrong since there are sources of glutamate in at least two of the products.

4. **Fantastic Original Rice Crackers:** Ingredients: rice flour, seasoning powder: [sugar, salt, **soy sauce powder** [contains soy, **hydrolysed wheat** (gluten free)], flavour enhancers E627, E631, vegetable oil (antioxidant 306).

It would take chemistry training to recognise that this product is predominantly flavoured by monosodium glutamate (MSG 621) from the hydrolysed wheat, with the effects of that additive boosted 10-15 times by the addition of the inadequately tested ribonucleotide family of flavour enhancers. Since both MSG and additive 635 have received a well-justified bad press, food manufacturers have swung to hidden sources of MSG and to showing the component ingredients of 635, which are 627 and 631.

### **Propionates 280-283**

**Bazaar Lavash flatbread:** Ingredients: Wheat Flour , Wholemeal Wholegrain Wheat Flour(45%), Canola Oil, Vinegar, Iodised Salt, **Cultured Wheat Flour**, Barley Malt Flour, Vitamins (Thiamine, Folate).

Despite advertising “No artificial preservatives” among the ingredients is an innocuous "cultured wheat flour" which has been cultured with propionibacteria and so functions as a major source of the propionate bread preservative (282). This is a deliberate avoidance of the necessity to label functional preservatives.

So often FSANZ claims in the media and on your website that the labels can inform those who are sensitive to food additives, but this is not the case unless you are a trained food technologist.

I would appreciate your advice as to what action you will take on this emerging issue.

Yours truly

Dr Howard Dengate

cc Nick Stace, CEO CHOICE  
57 Carrington Rd  
Marrickville NSW 2204

PO Box 718, Woolgoolga NSW 2456. Ph 02 6654 7500, [confodnet@ozemail.com.au](mailto:confodnet@ozemail.com.au)

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**Office of the Chief Executive Officer**

Dr. Howard Dengate  
Food Intolerance Network  
PO Box 718  
**WOOLGOOLGA NSW 2456**

Dear Dr. Dengate

Thank you for your letter of 18 April regarding the labelling of food containing ingredients that contain naturally occurring glutamates or propionates, and 'no added' and 'free from' claims in relation to monosodium L-glutamate (MSG).

With respect to glutamates, it is true that they occur naturally in some foods and ingredients, such as vegetable protein extract, hydrolysed vegetable protein, yeast extract (hydrolysed or autolysed), beef extract and seaweed extract. Similarly, propionic acid is produced naturally when propionibacteria is added to some foods and ingredients.

When added as food additives to foods, glutamates and propionates are required to be labelled in accordance with clause 4 of Standard 1.2.4 – Labelling of Ingredients of the Australia New Zealand Food Standards Code (the Code). Clause 4 requires all ingredients (unless where exempt) to be listed in a statement of ingredients in descending order of ingoing weight. All ingredients must be declared using one of the following:

- the common name of the ingredient
- a name that describes the true nature of the ingredient, or
- where applicable, a generic name for the ingredient where set out in the Standard.

Additionally, food additives, including MSG, must be declared in accordance with the ingredient labelling requirements set out in clause 8 of Standard 1.2.4. Where MSG has been added to the food, it is required to be declared in the correct place in the ingredient list as either 'Flavour enhancer (MSG)' or 'Flavour enhancer (621)'. The Code also contains permissions for other flavour enhancers, which are identifiable by their own specific code numbers, and must be declared in the statement of ingredients.

The Code does not specifically regulate the claims 'No added MSG' and 'MSG free'. Representations about food are subject to the *Australian Consumer Law Act 2010*, as administered by the Australian Competition and Consumer Commission (ACCC). The *Australian Consumer Law Act 2010* prohibits businesses from engaging in false or misleading activities. If you believe that some foods are contravening fair trade legislation which states that representations about food must not mislead, deceive or be false, that is, that food carrying the claims noted above or containing glutamates or propionates from natural sources is being inappropriately represented, you may wish to contact the ACCC. The ACCC can be contacted through their website at: <http://www.accc.gov.au/content/index.phtml/itemId/54217>, or by calling 1300 302 502 from within Australia.

Claims such as 'ideal for those who have intolerances to MSG' may, however, be captured under Standard 1.1A.2 – Transitional Standard – Health Claims. Enforcement of the Code is the responsibility of the health departments in the States and Territories. If you have any concerns regarding claims about intolerances, you could contact the relevant health department from the following link:

<http://www.foodstandards.gov.au/foodstandards/foodenforcementcontacts/> .

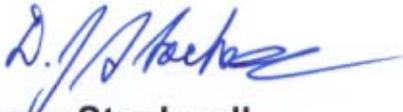
As noted in your letter, FSANZ provides consumer information about intolerances on our website at: <http://www.foodstandards.gov.au/consumerinformation/foodintolerances.cfm> . This fact sheet includes a link to the excellent web page for the Royal Prince Alfred Hospital Allergy Unit, which provides specific information about food intolerances. FSANZ has also published a consumer guide on food additives titled 'Choosing the Right Stuff- the official shoppers' guide to food additives and labels, kilojoules and fat content', which lists the name and function of each food additive represented by the numbering system. FSANZ also provides alphabetical and numerical lists of food additives on our website at:

<http://www.foodstandards.gov.au/scienceandeducation/publications/choosingtherightstuff/> .

These lists can be downloaded for free.

I trust this information has been of assistance.

Yours sincerely



**Dean Stockwell**

Chief Executive Officer (A/g)

12 May 2011