



28 September 2020

Food Standards Australia New Zealand
PO Box 5423 PO Box 10559
KINGSTON ACT 2604
by email to submissions@foodstandards.gov.au

Application A1191 - Mono- and diglycerides of fatty acids (INS 471) as glazing agent for fruits and vegetables

I wish to make comment on this Application on behalf of the Food Intolerance Network (FIN), which with 15,872 current members is probably the largest consumer organisation focused on food in Australia.

In consulting members, there was broad acceptance that the glycerides do not pose any health threat in themselves, nor does their composition or intake vary from that likely to exist in current diets.

However, there remain three concerns:

First, widespread anger and concern about yet another substance being added to our foods, being effectively unavoidable because it will be widely used, and in most cases these glycerides will NOT appear on any ingredient labels. Again, approval of this application will disadvantage consumers' interests in knowing what is used in and on their food. I note that this concern already exists with other currently approved glazing agents such as carnauba wax (903) and shellac (904).

Second, while there is evidence provided that glycerides extend the shelf life of produce, no evidence has been provided that shows that this extension of shelf life has not come at the expense of the nutritive value of the produce. It seems highly likely with senescent products such as fruit and vegetables that there will be a loss of nutritive value such as a lower vitamin content and natural antioxidants over the extra time. So there will be a tradeoff in lower wastage (benefitting the seller) and lower nutrition (to the detriment of the consumer). It is noteworthy that the word 'nutrition' appears once only in the Application (referring to claims) and that nutrition is not considered important enough to be explicitly considered in assessing any such applications by FSANZ. Evidence regarding the nutritional effects of glycerides should be requested from the Applicant.

Third, members noted that the EU permits glycerides on specific fruit only, not generally and not on any vegetables. All of the permitted fruits are peeled before consumption. Therefore we urge that FSANZ follow EU regulation with glycerides 471 in this instance and permit use of the food additive for the surface treatment specifically of whole citrus fruits, melons, pineapples, bananas, papayas, mangos, avocados and pomegranates at use levels of GMP, and not for cut fruit and not for any vegetables.

Regards

A handwritten signature in dark ink, appearing to read 'H. Dengate', with a large circular flourish at the end.

Howard Dengate BSc (Food Sci UNSW), PhD (Plant Sci LC), Cert Plant-based Nutrition (eCornell)

www.fedup.com.au

02 6654 7500

PO Box 718 WOOLGOOLGA NSW 2456 Australia

PO Box 718, Woolgoolga NSW 2456 AUSTRALIA +61 2 6654 7500 confoodnet@ozemail.com.au

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