



28 July 2018

Food Standards Australia New Zealand
PO Box 5423 PO Box 10559
KINGSTON ACT 2604

A1158 – Rosemary extract as a food additive

I wish to make comment on this Application on behalf of the Food Intolerance Network (FIN), which with 14,534 current members is probably the largest consumer organisation focused on food in Australia.

First, I do not understand why this application is being put forward at this time given that it is already being used for this function in our food supply. Smiths Crisps is a most recent case, but there are many more examples. Has it been added as an **ingredient** in the past, which is perfectly legal, and now it is becoming a **food additive** with the number 392? And if so, why? Is this because food manufacturers have suddenly found that they are using a concentrated substance for a technological purpose without approval and so FSANZ is helping to cover their potential legal liability? Can you enlighten our members?

Second, many of our members have been proven to react to this extract as it is very high in salicylates, which are used as markers for a wide range of chemicals made by plants to protect themselves from attack. I note that there is only a temporary ADI that will be withdrawn at the end of 2018 if more scientific evidence is not forthcoming. I further note that these studies are rat studies on developmental or reproductive toxicity. Are studies relevant to humans ever going to occur, particularly as FSANZ noted that the dietary exposure estimates for rosemary extract for high consumers in the European and USA populations ... may exceed the upper bound of the temporary ADI by up to 2.7-fold? Once again, food regulators' narrow definition of food safety may leave consumers exposed in my view.

Regards

A handwritten signature in brown ink, appearing to be 'U. D. ...', is located at the bottom of the page. The signature is written in a cursive style with a large loop at the end.

Howard Dengate BSc PhD

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