

# PROPOSAL P1026

## MANDATORY LABELLING OF LUPIN AS AN ALLERGEN – SUBMISSION



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### FROM

28<sup>th</sup> February 2016

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### INTRODUCTION

We write on behalf of the Grain Industry Association of Western Australia (GIWA) Inc and the GIWA Pulse Council, with a submission regarding the **proposed mandatory declaration of lupin as an allergen (Proposal P1026)**.

GIWA is a value chain focused, not-for-profit member based organisation representing the entire grains industry in Western Australia, from researchers and plant breeders, to growers, processors, logistics enterprises, consultants, government and the trade.

### GIWA FULLY SUPPORTS MANDATORY LABELLING OF LUPINS AS AN ALLERGEN IN THE FACE OF ITS GROWING POPULARITY AS A HEALTH FOOD

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#### LUPIN – RISE IN POPULARITY AS A HEALTH FOOD

Lupin is used in a wide range of food products in many countries particularly in Europe, and increasingly in Australia. Lupin, like other protein containing foods (e.g. *peanuts, tree nuts, soy, wheat, eggs, milk, fish and shellfish*) may trigger an allergic reaction in a small percentage of the population. About 5% of children and 2% of adults are estimated to suffer from food allergy (Australasian society of clinical immunology and allergy, 2015). Given the increased issues in Australia with obesity and diabetes, it is not surprising that a locally grown grain with exceptional nutritional composition and health benefits is being increasingly used as a functional food or food ingredient. More common a food

becomes in the everyday diet, the more people will report an allergy and lupin allergy is expected to rise.

## LUPIN HAS AN EXCEPTIONAL NUTRIENT PROFILE

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**Lupin is impressively the world's richest source of combined protein and fibre with negligible starch.**

40% protein | 30% fibre | negligible starch | zero GI | gluten free | GMO free | Low anti-nutritional factors | Low in potentially toxic phytoestrogens found in high levels in soy

## LUPIN HEALTH BENEFITS

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Health is not a niche anymore but becoming an expectation among the consumers. The following health benefits is expected to push lupin as part of everyday food.

- Increased satiety and reduced energy intake
- Blood glucose modulating effects (lupin gamma-conglutin protein)
- Bowel Health (Lupin Kernel fibre)
- Decrease in blood pressure
- Cholesterol lowering effects

Please see references below for a [list of scientific studies](#) that support the health benefits of lupin.

## WHY IS LUPIN ALLERGENICITY IMPORTANT TO THE INDUSTRY?

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Allergenic foods are harmless to the majority of consumers. However;

- Three possible forms of clinical allergy to lupin have been reported: a) the most frequent is primary allergy to peanut with cross-reactivity to lupin b) primary allergy to lupin, c) primary allergy by inhalation of lupin pollen or flour (often occupational) (Ramanujam *et al*, 2016)
- It has been claimed that fewer than 1% of the population that have eaten lupin-based foods have been reported to show an immediate allergic reaction (Australasian society of clinical immunology and allergy, 2015). In Australia, 14 severe allergic reactions to lupin have been documented in an anaphylaxis register (FSANZ, Risk assessment). Food Allergies are increasing in prevalence, are potentially life threatening and there is no cure.
- Successful management is through avoidance of food
- Consumers lives are at risk from eating formulated foods (hidden ingredients)

- Awareness, education and communication can prevent deaths, improve quality of life of food allergic consumers
- Supporting a transparent labelling system demonstrates the industry's commitment to Food safety and consumer health. Some Australian food companies are increasingly adopting voluntary allergen labelling for lupin.

## GIWA'S POSITION IN SUPPORT OF MANDATORY LABELLING OF LUPIN AS AN ALLERGEN

### KEY MESSAGES

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- GIWA strongly supports FSANZ'S move towards mandatory labelling of lupin as an allergen
- GIWA believes that a transparent labelling system demonstrates and furthers the industry's full commitment to consumer food safety and also assists the Industry being maligned via innuendo through adverse press or even avoid litigation if it is later proven that the cause of a consumer's worsening condition or demise was assisted by consumption of lupin food.
- GIWA considers that there must be regard for the fact that labels on lupin ingredients and products raise awareness of lupin as a food allergen but still need to attract majority of consumers who can actually benefit by including lupins as part of healthy eating and that any mandatory labelling requirements should not undermine the commercial viability of the product.

### SUPPORT FOR GIWA'S POSITION - INDUSTRY, UNIVERSITY AND GOVERNMENT ORGANISATIONS JOIN HANDS

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We strongly believe that the small number of people who may be intolerant to lupin consumption need the protection of mandatory allergen labelling. However the sustainable nutrition and health benefits of lupin as a food to the community as a whole, especially those at risk of the prevalent chronic diseases of today is vast - **Curtin University**

Foods containing lupin or possibly containing lupin will need to be labelled in the same way as other known allergens such as peanuts – **The UWA Institute of Agriculture**

It is in the long term interests of the industry to ensure that consumers can make a fully informed decision about the inclusion of lupins in their diet. Any unnecessary delay when the allergen effects are well known to industry could result in consumer dissatisfaction and a backlash against the product in response - **Department of Agriculture and Food, Western Australia**

Mandatory labelling of lupin in food will support the developing commercialisation of lupin food products by mitigating the frequency of adverse lupin allergy events - **Australian Export Grains Innovation Centre**

Mr. Peter Roberts (**GRDC Chair, Western Panel**), Mr. Peter Wilson (**Chair, Pulse Australia**) and Mr. Rod Birch (**Catalina Farms**) are all supportive of the proposed move.

## CONCERNS

Supportive of mandatory labelling of lupin as an allergen. However there are concerns that registering lupin as an allergen at this point in time, when the WA pulse industry is working hard to promote the human health and nutrition benefits of lupin, may also undermine the commercial viability of the industry's product development. – **Coorow Seeds, a key lupin grower and processor**

## REFERENCES

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8. Archer, B. J., Johnson, S. K., Devereux, H. M. & Baxter, A. L. 2004, Effect of fat replacement by inulin or lupin-kernel fibre on sausage patty acceptability, post-meal perceptions of satiety and food intake in men. *Brit. J. Nutr.* vol. 91, pp. 591-599.

## OTHER USEFUL ARTICLES

Ramanujam, R., Fiocchi, A., Smith., W. 2016, Lupin Allergy: Is it really a cause for concern?, *Agro FOOD Industry Hi Tech*, Vol. 27 pp.10-14.

Australasian Society of Clinical Immunology and allergy, 2015, Information for Health Professionals

Australasian Society of Clinical Immunology and allergy, 2015, Information for Patients, Consumers and Carers

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## ACKNOWLEDGEMENTS

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