

9 October 2019

The National Allergy Strategy, would like to make the following submission regarding the Therapeutic Goods Administration consultation titled *Increased online access to ingredient information*.

Background

The National Allergy Strategy is a partnership between the Australasian Society of Clinical Immunology and Allergy (ASCIA) and Allergy & Anaphylaxis Australia, the leading medical and patient support organisations in Australia. The National Allergy Strategy is governed by a Steering Committee comprising equal representation from both ASCIA and Allergy & Anaphylaxis Australia. Each National Allergy Strategy project engages with key stakeholder organisations to ensure the best possible outcomes are achieved.

The mission of the National Allergy Strategy is:

To improve the health and quality of life of Australians with allergic diseases, and minimise the burden of allergic diseases on individuals, their carers, healthcare services and the community.

Submission

People with allergy and/or their carers need to be able to identify therapeutic goods which are safe for them to use. The National Allergy Strategy prefers option 1A which will provide a significant improvement on the allergen information currently available.

The National Allergy Strategy prefers option 1A to 1B, as option 1B exempts all proprietary ingredient mixes, while option 1A exempts only flavours and colours.

However, both options (1A and 1B) would require people with an allergy other than the ones prescribed, to make further enquiries about the composition of such mixes before using the medication.

Recommendations

The National Allergy Strategy would like to suggest the following:

- The TGA should consider mandating the declaration of all ingredients in proprietary ingredient mixes.
- The allergen information on the medication label should always be visible (not covered by stickers).
- The TGA should consider mandating the declaration of other substances requiring declaration in Food Standard 1.2.3 in all therapeutic goods (e.g. lupin).
- There are plain English Allergen Labelling changes afoot in Australia, hence engagement with FSANZ to ensure consistency of labelling approaches would greatly benefit people with allergies. This includes the listing of wheat (rather than gluten) for those allergic to wheat rather than those with coeliac disease.