

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

Email: Submissions@foodstandards.gov.au



Dear Madam/Sir

Accord Australasia is pleased to provide the following comments in response to the Food Standards Australia New Zealand (FSANZ) Proposal P1014 – Primary Production & Processing Standard for Meat & Meat Products.

Accord Australasia is the peak national industry association representing the manufacturers and marketers of formulated hygiene, cosmetic and specialty products, their raw material suppliers, and service providers. Accord member companies make and/or market fast-moving consumer and commercial goods primarily in Australia and New Zealand.

Accord has 100 member companies which range from smaller Australian-owned family businesses to the local operations of large consumer brand multinationals (a full membership list is provided at Attachment 1).

Sector products play a vital role in:

- Safeguarding public health: Maintaining essential standards of hygiene and sanitation in institutions, hospitality, manufacturing and agriculture.
- Promoting personal well-being: Helping people keep clean, healthy and shielded from harmful effects of the environment.
- Maintaining comfortable homes: Enabling people to keep their everyday surroundings clean and inviting.
- Enhancing quality of life: Giving people greater personal freedom through time- and effort-saving technologies.
- Boosting confidence and emotional wellbeing: Providing opportunities for self-expression, individuality and pampering.
- Keeping the wheels of commerce and industry turning: Fulfilling specialised uses in industry, institutions and agriculture.
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Headline features and statistics for our industry's economic footprint include:

- Estimated annual retail-level sales of industry products nudging the \$10 billion mark.
- Accord member companies directly contribute more than 12,000 full-time equivalent jobs.
- Nationally more than 180 offices and more than 66 manufacturing sites are operated by Accord member companies.
- A survey of Accord members shows that 29% have contact with FSANZ.

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Products for healthy living and a quality lifestyle

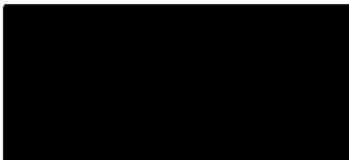
As chemical manufacturers of speciality hygiene products for the food sector, Accord members have a specific and direct interest in the FSANZ proposed amendment to Proposal P1014 – Primary Production & Processing Standard for Meat & Meat Products.

Accord supports in-principle the proposed changes on the basis that there will be no additional impost on the chemical industry and no additional cost burden. We note that the documents indicate that the proposed changes are not meant to impose any additional cost burden on farmers. We assume that the same applies to all those in the supply chain. Supporting Document 4 on the chemical risk profile of meat and meat products finds that there are extensive regulatory and non-regulatory measures in place resulting in minimal public health and safety concerns.

However, we urge FSANZ to be cautious and ensure that there are no unintended consequences on the chemical industry through the introduction of the whole of supply chain monitoring process. Chemical suppliers of processing aids, cleansers and sanitisers should not be required to provide additional evidence of the safety or suitability of chemical ingredients contained in products than is currently required as a result of the reform process.

Should you have any queries in relation to the comments provided please do not hesitate to contact me on 02 9281 2322 or by email at: dsabic@accord.asn.au.

Yours sincerely



Director, Regulatory Reform

3 December 2013

Members

Consumer, Cosmetic and Personal Care

Advanced Skin Technology Pty Ltd	KAO Brands Australia Pty Ltd
Amway of Australia Pty Ltd	Keune Australia
Apisant Pty Ltd	Kimberly-Clark Australia
AVON Products Pty Limited	La Biosthetique Australia
Beautiworx Australia Pty Ltd	La Prairie Group
Beautopia Hair & Beauty Pty Ltd	L'OCCITANE Australia Pty Ltd
Beiersdorf Australia Ltd	L'Oréal Australia Pty Ltd
BrandPoint Pty Ltd	LVMH Perfumes and Cosmetics
Chanel Australia	Mary Kay Cosmetics Pty Ltd
Clorox Australia Pty Ltd	Natural Australian Kulture Pty Ltd
Colgate-Palmolive Pty Ltd	Nutrimetics Australia
Combe Asia-Pacific Pty Ltd	NYX Pty Ltd
Conair Australia Pty Ltd	Panamex Group
Cosmax Prestige Brands Australia Pty Ltd	Procter & Gamble Australia Pty Ltd
Coty Australia Pty Limited	PZ Cussons Australia Pty Ltd
De Lorenzo Hair & Cosmetic Research Pty Ltd	Reckitt Benckiser
Elizabeth Arden Australia	Revlon Australia
Emeis Cosmetics Pty Ltd	SC Johnson & Son Pty Ltd
Energizer Australia Pty Ltd	Scental Pacific Pty Ltd
Estée Lauder Australia	Shiseido (Australia) Pty Ltd
Evolve Hair Concepts Pty Ltd	The Heat Group Pty Ltd
Frostbland Pty Ltd	The Purist Company Pty Ltd
GlaxoSmithKline Consumer Healthcare	Three Six Five Pty Ltd
Helios Health & Beauty Pty Ltd	Trimex Pty Ltd
iNova Pharmaceuticals – A Valeant Company	True Solutions International Pty Limited
Integria Healthcare (Aus) Pty Ltd	Ultraceuticals
International Beauty Supplies Pty Ltd	Unilever Australasia
Johnson & Johnson Pacific	Vitafive
KAO Australia Pty Ltd	Weleda Australia Pty Ltd

Hygiene and Specialty Products

Albright & Wilson (Aust) Ltd	Lab 6 Pty Ltd
Antaria Limited	Novozymes Australia Pty Ltd
Applied Australia Pty Ltd	Nowra Chemical Manufacturers Pty Ltd
BP Castrol Australia Pty Ltd	Peerless JAL Pty Ltd
Brenntag Australia Pty Ltd	Recochem Inc
Castle Chemicals Pty Ltd	Rohm and Haas Australia Pty Ltd
Chemetall (Australasia) Pty Ltd	Solvay Interox Pty Ltd
Clariant (Australia) Pty Ltd	Sopura Australia Pty Ltd
Deb Australia Pty Ltd	Tasman Chemicals Pty Ltd
Dominant (Australia) Pty Ltd	Thor Specialties Pty Limited
Ecolab Pty Limited	True Blue Chemicals Pty Ltd
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