

10 August 2016

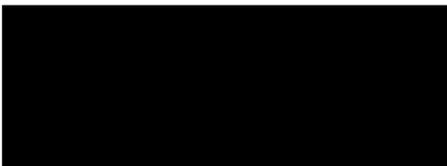
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1113: Extension of the use of Propionates in Processed Meat.***

Yours sincerely



Katherine Rich
Chief Executive



***Call for submissions – Application A1113:
Extension of the use of Propionates in
Processed Meat***

**Submission by the New Zealand Food & Grocery
Council**

10 August 2016

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1113: Extension of the use of Propionates in Processed Meat.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

OVERARCHING COMMENTS

3. NZFGC supports this Application and notes that the prospect of being able to use propionates in processed meat, poultry and game will have a flow on positive benefit for New Zealand manufacturers should they choose to use them.
4. Authoritative, internationally recognised agencies have concluded, following assessment, conclude that there is no evidence of systemic toxicity resulting from oral exposure to propionates. FSANZ reaches the same conclusion and this forms part of the reason for NZFGC’s support. NZFGC also supports the labelling of these substances as food additives, using the class name ‘Preservative’ followed by the relevant international code number (280, 281, 282, or 283) or the name of the substance.

SPECIFIC COMMENTS

The Application

5. The application seeks to extend the use of propionic acid and its calcium, sodium and potassium salts to processed and ‘processed comminuted’ meat, poultry and game products (collectively referred to as “processed meat, poultry and game”). Its use is intended as an alternative anti-microbial preservative to limit microbial growth, in particular *Listeria monocytogenes*, in processed meat, poultry and game products.

Use of propionates

6. Propionates as food additives have a long history of use and are already permitted in the Food Standards Code as food additives for a wide variety of foods including bread and bakery products, noodles and pasta, jams and chutneys, juices and other beverages, sauces and toppings and sports foods. Mostly these are at levels of ‘Good Manufacturing Practice’ rather than any set maximum.
7. Propionic acid is also naturally present in a wide variety of foods such as cheese, butter. The anti-microbial properties of the propionates are well-known and provide a positive benefit for the consumer when used. NZFGC is aware that use of such products are sometimes misinterpreted by people as allowing good manufacturing practices to be reduced because the product addresses some of the issues with microbiological contamination. This is not the case. The propionates are proposed as an addition to practices not a substitute for them.

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8. The applicants provided data on Australian recalls in support of their application. Over the period 2005-2014, there were 88 recalls for *Listeria monocytogenes*, 38 recalls for *Salmonella* and 29 recalls for *E.coli*. NZFGC examined the recall data for New Zealand for the period 2013-Jul 2016 and identified the following:

Table: Recalls due to possible microbiological contamination

Year	<i>Listeria monocytogenes</i>	<i>Salmonella</i>	<i>E.coli</i>
2016 (to Jul)	3	2	1
2015	2	1	--
2014	2	2	1
2013	1	--	--

Recalls due to microbiological contamination in New Zealand (extrapolating for 10 years as *L.monocytogenes* (20), *Salmonella*, (10) *E.coli* (4)) are lower as might be expected when compared with Australia (for 10 years *L.monocytogenes* (88), *Salmonella*, (38) *E.coli* (29)). NZFGC also notes that only three products with possible microbiological contamination in the period 2013-2016 were meat related products (a terrine, ham and burger). Nonetheless, the prospect of being able to use propionates in processed meat, poultry and game will have a flow on positive benefit for New Zealand manufacturers should they choose to use them.

Risk assessment

9. Assessments by authoritative internationally recognised agencies have concluded that there is no evidence of systemic toxicity resulting from oral exposure to propionates. FSANZ reaches the same conclusion.

Labelling

10. As the propionates for the proposed use are food additives and remain in the food after use, they must be listed as an ingredient. This could be under the class name 'Preservative' followed by the relevant international code number (280, 281, 282, or 283) or the name of the substance. NZFGC understands both options have use across the foods that are permitted to propionates and we have no concerns about the labelling.