

1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcome the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the call for submissions – *Proposal P1023 Tutin, Tocopherol and Food for Special Medical Purposes Standards Amendments*.

AFGC notes the intent of this proposal is to:

- (1) Extend the expiry date to 31 March 2015 for the interim maximum levels for tutin in honey and comb honey;
- (2) Correct an error regarding commencement dates for the new tocopherol nomenclature introduced via Proposal P1021; and
- (3) Amend Standard 2.9.5 to bring forward the commencement date and provide transitional arrangements for food for special medical purposes and also to clarify the intent of the exemption of Standard 1.5.1 from Standard 2.9.5.

2. AFGC POSITION

2.1. Tutin in Honey and Comb Honey

AFGC **supports** the proposal to ensure that a regulatory measure remains in force for tutin to enable completion of a comprehensive risk assessment to support an appropriate, permanent regulatory measure for tutin in food.

2.2. Tocopherol

AFGC **supports** the proposal to correct the commencement date for the revised tocopherols nomenclature and other minor typographical errors in P1021.

2.3. Food for Special Medical Purposes (FSMP)

2.3.1. Commencement date

AFGC **supports** the proposal to bring forward the commencement date for Standard 2.9.5 – Food for Special Medical Purposes to the date of gazettal of this Proposal. This will provide certainty for manufacturers and consumers in relation to these products.

2.3.2. Novel Food Exemption

AFGC **supports** the amendment to Standard 1.5.1 – Novel Foods to clarify the intent of the exemption for novel foods in Standard 2.9.5.

2.3.3. Consequential Amendments

AFGC **supports** the consequential amendments related to Standard 2.9.5 to maintain consistency across Australia and New Zealand and provide clarity for stakeholders.

2.3.4. Transitional arrangements

AFGC **support** the transitional arrangements proposed to allow manufacturers time to meet the new requirements in a cost effective manner.

3. SPECIFIC COMMENTS

3.1. Food for Special Medical Purposes (FSMP)

3.1.1. Transitional arrangements

Question for submitters:

Apart from the listed transitional arrangements, are there other elements of Standard 2.9.5 that would require time to transition if the Standard's commencement date were brought forward?

AFGC understand that there are further elements of Standard 2.9.5 that would require time to transition if the Standards commencement date were brought forward. These will be addressed by individual member companies in their submissions.

Stock in Trade

AFGC seeks confirmation of the stock in trade provisions applicable to these proposed exemptions apply from June 2014 for a period of 12 months, ie: til June 2015.

Australian Food and Grocery Council

AFGC MEMBER LIST AS AT 18 OCTOBER 2012

Full Members

- Arnott's Biscuits Ltd
- Australian Blending Company Pty Ltd
- Barilla Australia Pty Ltd
- Beak and Johnston Pty Ltd
- Beechworth Honey Pty Ltd
- Beerenberg Pty Ltd
- Bickfords Australia Pty Ltd
- Birch and Waite Foods Pty Ltd
- Body Science International Pty Ltd
- Bronte Industries Pty Ltd
- Bulla Dairy Foods
- Bundaberg Brewed Drinks Pty Ltd
- Bundaberg Sugar Ltd
- Byford Flour Mills/Millers Foods
- Byron Food Science
- Campbell's Soup Australia
- Canon Foods
- Cantarella Bros Pty Ltd
- Carman's Fine Foods
- Cerebos (Aust) Ltd
- Cheetham Salt Limited
- Christie Tea Pty Ltd
- Church & Dwight (Australia) Pty Ltd
- Clorox Australia Pty Ltd
- Coca-Cola Amatil Ltd
- Coca-Cola South Pacific Pty Ltd
- Colgate-Palmolive Pty Ltd
- Coopers Brewery Ltd
- D.E Coffee & Tea Retail Australia/Sara Lee Coffee & Tea Retail Australia
- Danisco Australia Pty Ltd
- Devro Pty Ltd
- DSM Food Specialties Australia Pty Ltd
- Eagle Boys Pizza
- Earlee Products Pty Ltd
- Ferrero Australia Pty Ltd
- Fibrisol Service Australia Pty Ltd
- Fonterra Australia Pty Ltd
- Food Spectrum Group
- FPM Cereal Milling Systems Pty Ltd
- Freedom Foods Group
- Frucor Beverages (Australia) Pty Ltd
- General Mills Australia Pty Ltd
- George Weston Foods Ltd
- GlaxoSmithKline Consumer Healthcare
- Go Natural
- Goodman Fielder Limited
- H.J. Heinz Company Australia Limited
- Harvest FreshCuts Pty Ltd
- Healthy Snacks Australia Pty Ltd
- Hoyt Food Manufacturing Industries Pty Ltd
- Hungry Jack's Australia
- Igea Group
- Jalna Dairy Foods Pty Ltd
- JBS Australia Pty Limited
- Jireh International Pty Ltd
- Johnson & Johnson Pacific Pty Ltd
- Kellogg (Aust) Pty Ltd
- Kerry Ingredients Australia Pty Ltd
- Kimberly-Clark Australia Pty Ltd
- Kitchens of Sara Lee
- Kraft Foods Limited
- Laucke Flour Mills Pty Ltd

- Lindt & Sprungli Australia
- Lion Dairy and Drinks Pty Ltd
- Madura Tea Estates
- Manildra Harwood Sugars
- Mars Chocolate
- McCain Foods (Aust) Pty Ltd
- McCormick Foods Australia Pty Ltd
- McDonald's Australia Ltd
- Merisant Australia Pty Ltd
- Metarom Australia P/L
- Mrs Mac's Pty Ltd
- Murray Goulburn Co-operative Co Ltd
- Myosyn Industries Pty Ltd
- Nerada Tea Pty Ltd
- Nestle Australia Ltd
- Nutricia Australia Pty Ltd
- Ocean Spray International, Inc
- Only Organic 2003 Pty Limited
- Parmalat Australia Ltd
- Patties Foods Ltd
- Pfizer Consumer Healthcare
- Popina (Vic) Pty Ltd
- Procter & Gamble Australia Pty Ltd
- QSR Holdings
- Queen Fine Foods Pty Ltd
- Reckitt Benckiser (Australia) Pty Ltd
- Red Bull Australia Pty Limited
- Rosella Foods Pty Ltd
- Sandhurst Fine Foods Australia
- Sanitarium Health and Wellbeing Company
- SC Johnson & Son Pty Ltd
- SCA Hygiene Australasia Pty Ltd
- Schweppes Australia Pty Ltd
- Sensient Technologies (Australia) Pty Ltd
- Simplot Australia Pty Ltd
- Solaris Paper Pty Ltd
- Spicemasters Australia Pty Ltd
- Steric Pty Ltd
- Stuart Alexander & Co Pty Ltd
- Subway Franchisee Advertising Fund Australia/NZ
- Sugar Australia Pty Ltd
- SunRice
- Swisse Vitamins Pty Ltd
- Tasmanian Flour Mills Pty Ltd
- Tate & Lyle ANZ Pty Ltd
- The Smith's Snackfood Company
- The Vege Chip Company
- The Wrigley Company Pty Limited
- Tixana Pty Limited
- Unilever Australasia
- Vital Health Foods (Australia) Pty Ltd
- Ward McKenzie Pty Ltd
- Yakult Australia Pty Ltd
- Yum! Restaurants Australia Pty Ltd

Associate Members

- A.T. Kearney Pty Ltd
- ACI Operations Pty Ltd
- Addisons
- Allens Arthur Robinson
- Amcor Australasia

- Australian Pork Limited
- Baker & McKenzie
- Benchmarking for Performance(B4P)
- Bizcaps Pty Ltd
- Brisbane Marketing
- CHEP Asia - Pacific
- CROSSMARK Asia Pacific
- CSIRO Food and Nutritional Sciences
- Dairy Australia
- Ettlin International Pty Ltd
- Food Allergen Control Training Analysis(FACTa)
- Food Liaison Pty Ltd
- Foodbank Australia Ltd
- Grain Growers Ltd
- Grant Thornton
- GS1 Australia Ltd
- Harris Smith
- IBM Australia Ltd
- Investment Attraction/trade and Investment Queensland
- King & Wood Mallesons
- KPMG
- Legal Finesse
- Linfox Australia Pty Ltd
- Logan City Council
- Meat and Livestock Australia
- Monsanto Australia Ltd
- New Zealand Trade and Enterprise
- Pacific Strategy Partners
- Red Rock Consulting
- Rentokil Initial Pty Ltd (Rentokil Pest Control)
- RQA Product Risk Institute
- Simons Green Energy Pty Ltd
- Six Degrees Executive Pty Ltd
- Spectrum Automation
- StayinFront Group Australia
- Strikeforce Alliance Pty Ltd
- Swire Cold Storage
- Swisslog Australia Pty Ltd
- Tetra Pak Marketing Pty Ltd
- The Food Group Australia
- The Nielsen Company
- Touchstone Consulting Australia Pty Ltd
- Visy Pak
- Wiley & Co Pty Ltd

Affiliate Members

- Australian Self-Medication Industry
- Association of Sales and Marketing Companies Australasia
- Baking Associations Australia
- CropLife Australia Limited
- Food & Beverage Importers Association
- Food Industry Association Qld Inc
- Food Q Inc
- Foodservice Suppliers Association of Australia
- Grains & Legumes Nutrition Council
- Private Label Manufacturers Association Australia/New Zealand