

DRAFT SUBMISSION

6TH SEPTEMBER 2014

Attention: Project Manager P1025

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia
2610.

Re: Code Revision

The Technical Committee of FFAANZ has reviewed this Proposal and submits the following comments for consideration. We have accepted the fact stated that the content has not changed

1. We can understand the principles involved in the revision but for those who have worked with the code for many years it will prove a steep learning curve – as it will be for new users. We would suggest the following :

- a. As the new standards constantly refer to other sections in the code that “hyperlinks” be provided so that easy access to relevant sections directly can be made. This is particularly applicable when looking at regulations on ComLaw.
- b. That a Comprehensive User Guide be provided.

2. Individual Standards should be able to be downloaded and not the complete Section or an alternative system made available.

3. That the Current Code maintenance be included in the Revision.

4. Fats and Oils – The name of the Oil needs to be named in 2.4.2 and with oil as an ingredient. (We have not found this clause in the Draft).

5. Whilst 1.3.1-4 lists the maximum levels of colour permitted for specific colours – these levels should be repeated in S16-4 where the actual colours are listed.

Best Regards



Peter Bush
Secretary
FFAANZ