



Nestlé Submission

Code Revision

(P 1025)

September 2013

## **Nestlé Submission**

### **Proposal 1025 Code Revision**

#### **Executive Summary**

This submission is made on behalf of Nestlé Australia Ltd and Nestlé New Zealand Ltd.

Nestlé welcomes the opportunity to provide comments in response to Food Standards Australia New Zealand (FSANZ) Proposal 1025 Code Revision.

Nestlé supports the readability and logical format of the new Code, however, considers that the benefits to industry must be compared against the cost to industry of updating documentation and re training of staff Nestlé considers that FSANZ needs to conduct a Regulatory Impact Statement to define this.

Nestlé considers that the review of the Code is an immense undertaking that will necessitate a large amount of maintenance of internal documents, and procedures, in addition to re-training of staff in how to navigate the new format.

Nestlé supports the comprehensive submission that the AFGC has prepared in consultation with its members, of which Nestlé participated. There are many areas in which Nestlé considers, there has been a change in understanding or intent of a particular clause or definition, and requests that these issues be addressed before any further progression on this new Code format.

#### **Specific Details**

##### **Changes to internal documentation & Re training**

Changes to the numbering of the current FSC will create major workload with regards to updating internal documents which reference specific standards and clauses within the current Code.

An overview of these documents is listed below, with a total cost to business of around \$345,000

Document Type	Approximate Number of documents	Cost – man hours
Regulatory Guides Training Documents Competency Testing Artwork Review	28	\$117,600
Manufacturing Specifications	873	\$201,885
Labelling SOP's		
Inter-market Supply Briefs		
Re training Costs	Nestlé employs over 60 FTE in the Regulatory, Legal, Quality, Consumer Services, Outsourced Manufacturing & Product Development functions	\$24,000

	<p>which require an understanding of locating relevant sections of food regulations in the FSC.</p> <p>Considerable re training and education would be required to keep these staff members educated on the new format of the Code. Nestle estimates this to include both face to face training, email and remote education as well as travelling costs to carry out these sessions.</p>	
TOTAL		\$343,485