

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

Dear FSANZ

**P1038: Health Claims – Vitamin & Mineral Claims & Sodium Claims
about Food containing Alcohol**

The Australian Food and Grocery Council (AFGC) makes the following submission in response to the FSANZ Call for Submissions of 29 June 2015 regarding Proposal P1038. P1038 proposes to vary Standard 1.2.7 (both in the existing Food Standards Code and in the rewritten P1025 Food Standards Code that comes into effect in March 2016) in order to –

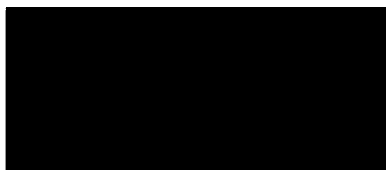
- address an inconsistency between Standard 1.2.7 and Standard 1.3.2 where a product's serving size is less than the reference quantity specified in Standard 1.3.2; and
- permit foods (but not beverages) containing more than 1.15% alcohol by volume (ABV) to continue to make salt and sodium nutrient content claims (especially low- and reduced salt claims in respect of fermented soy sauce).

The AFGC supports these policy objectives of P1038 and in general supports the draft variations proposed to give effect to these objectives.

The AFGC notes that foods containing more than 1.15% ABV may wish to make nutrient content claims beyond salt and sodium, and recommends that the variation might be broadened to encompass all nutrient content claims to avoid the need for further applications or proposals in the future. Such a measure would also result in simpler drafting.

The AFGC also restates its concern that clause 3(b) of Standard 1.2.7 unintentionally prohibits claims of low alcoholic content or 'light' beers, an issue which could be corrected, or at least clarified, as part of this Proposal.

Please contact me should you require any further information regarding this submission.




Director, Legal and Regulatory



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