

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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SUBMISSION

17 September 2015

Attention: **Project Manager - Application A1104**
Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Voluntary Addition of Vitamins and Minerals to Nut- and Seed- based Beverages

FTA Australia has reviewed this [Application](#) and endorses the following submission prepared by the Technical Sub-Committee:

1. The Committee agrees with the Draft variation to the revised *Australia New Zealand Food Standards Code* (commencing 1 March 2016) as published in the Call for Submissions of 4 September 2015 [21-15] and submits the following points for consideration.
2. Although the “food group” definition at Standard 1.1.2-2(3) is relevant, it should also be noted that the primary definition is in Standard 1.1.2-3 which separately defines ‘milk’ as:
“the mammary secretion of milking animals, obtained from one or more milkings for consumption as liquid milk or for further processing, but excluding colostrums;”
3. Thus it is contended that except for Coconut Milk and Almond Milk, both of which have used the description ‘milk’ traditionally and internationally for many years, all the Nut- and Seed – based beverages should be specifically proscribed from using the term ‘milk’ in all labelling/advertising circumstances.
4. Also it is strongly suggested that “Coconut Milk” and “Almond Milk” be regulated to be called “Coconut Milk Beverage/Drink” or “Almond Beverage/Drink” in future as these two products cannot comply with the definition for ‘milk’. Also these two products do not have the protein and fat components compared to the mandatory minimum levels required in milk.
5. The only circumstance where ‘milk’ should be permitted on the label of the fortified Nut- and Seed-based beverages is in the negative sense of a mandatory warning statement re “not a milk substitute”, etc. as will be permitted in the revised Standard 9.

If there are any queries regarding this submission, please contact the Technical Secretary of the Technical Committee,
[REDACTED], (03) 9532 8213, [REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Application](#).

Yours sincerely,

[REDACTED]
Technical Secretary – FTA AUSTRALIA