



19th March 2018

Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143

Submission for Application A1144 – Re-categorising coconut milk for food additive permission

Dear Sir or Madame,

The New Zealand Beverage Council (NZBC) represents the manufacturers of New Zealand's juice, carbonated drink and bottled water brands, and their suppliers. The Association has established a Voluntary Code of Practice that is aimed at ensuring accurate and truthful labelling on juice products. In particular, the Code signifies compliance with the relevant Food Regulations and Fair Trading requirements. This system is at the forefront of industry self-regulatory developments in New Zealand and over 95 per cent of the juice sold in New Zealand is supplied by NZBC members who are signatories to the Code.

It is understood that the FSANZ are assessing an Application to consider whether the food category for food additive permissions for coconut milk products is more appropriate under fruits rather than beverages.

The NZBC, acting on behalf of the non-alcoholic refreshment beverages industry in New Zealand would like to show our support for this Application. As the Application states, coconut milk is used for cooking and requires emulsifiers, stabilisers and thickeners to ensure that the water and fat components remain combined as consumers expect.

We do however feel that further consideration is required to other food products manufactured from coconuts such as coconut water. The NZBC feel that coconut water should remain under 14.1.2.1. Fruit and vegetable juices given the nature of the product. Products that contain coconut water with additional ingredients, such as sugar, would adhere to the requirements under 14.1.2.2 Fruit and vegetable juice products and therefore be allowed to contain the additives as outlined in the relevant section of Schedule 15 in the Food Standards Code. We request that FSANZ give further consideration to the categorisation of other food products taken from coconuts while assessing this Application.

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We thank FSANZ for the opportunity to provide this submission in support of the Application A1144 Re-categorising coconut milk for food additive permissions. However, we would like to highlight the need to consider the categorisation of other products taken from coconuts.

If you wish to discuss any aspects of this correspondence contact me on

NZBC Technical Advisory Group