

**SUBMISSION FROM SA HEALTH
19 March 2018**

Application A1144 Re-categorising coconut milk for food additive permissions

SA Health welcomes the opportunity to provide comment on this application. SA Health does not support this application as the A1144 report does not provide sufficient information as described following.

Determining the most appropriate food category for coconut milk products.

This application seeks to determine the food category for a coconut milk product so that appropriate food additive permissions may be enforced by regulatory agencies.

A coconut milk product may be categorised as a beverage or a processed fruit and vegetable juice or a milk and dairy beverage alternative (such as soy milk, almond milk, oat milk or rice milk). A look at the supermarket shows that there are a variety of products available and the product labels describe a wide variety of serving suggestions and ways for the consumer to eat or drink.

Application A1144 report repeatedly states “Coconut milk products are not beverages”. However, there is little or no evidence supplied in the report to demonstrate the current usage of these products by consumers. SA Health suggests that a market survey of current coconut milk products available for sale in Australia and New Zealand and their uses be conducted by the applicant or FSANZ. The information could be used to support or not support re-categorising coconut milk for food additive permissions.

Harmonising with international standards

FSANZ must have regard to the promotion of consistency between domestic and international food standards when setting food standards. It is not important as stated in A1144 that the Code aligns with food categories and food additive permissions for coconut milk products with Codex Standards. However it is important that standards are harmonised with international standards while protecting public health and safety of the Australia and New Zealand public. A food standard may not align with international standards if it specifically protects public health and safety for the domestic market.

The Codex Standard for Coconut was prepared in 2003, and the food categories in the Codex General Standard for Food Additives (Codex Standard 192-1995) was established in 1995. The uses of food products and how appropriately they are

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categorised may have changed in the past 23 years due to changes in market consumption patterns and new product developments.

In 2000, in the review of the current food additive standard in the Code, FSANZ considered the categories described in the Codex General Standard for Food Additives (Codex Standard 192-1995), and decided upon review that the most appropriate category in the food additive standard for coconut milk and coconut cream products was under S5 14.1.2 fruit and vegetable juices and fruit and vegetable products. Many of the Codex categories do not align with the Australia New Zealand food categorisation system. From the A1144 report the changes that have occurred to coconut milk products that require a change in additive permissions are not evident.

Change to food additive and colours permissions

The draft variation will amend the table to section S15—5 to include new food category 4.3.0.5 (Coconut milk coconut cream and coconut syrup). The new food category will provide permission for sorbates (200-203) and benzoates (210-213) in coconut milk coconut cream and coconut syrup, subject to a maximum permitted level of 1000 mg/kg. It will also provide permission for sulphites (220-225, 228) in these foods subject to a maximum permitted level of 30 mg/kg. SA Health recognises that there is no increase in these permission levels made by the proposed drafting.

However, there is a separate condition linked to the GMP food additives for food category 14.1.2.1. It stipulates that these food additives are only permitted for juice separated by other than mechanical means. It is understood from FSANZ A1144 report that coconut milk is produced by mechanical means by grating the coconut endosperm or coconut meat. Therefore, the permission provided by food category 14.1.2.1 for the use of food additives listed in section S16—2 may not apply to coconut milk products.

The intention of the “separated by other than mechanical means only” note acts to preclude the use of additives and colourings in fruit and vegetable juices, because there is not technological justification for the use of these additives in this category, (which currently includes coconut milk products). Coconut milk, coconut cream and coconut syrup were listed below 14.1.2.1 in the hierarchy so that they intentionally did not have permissions for GMP additives, GMP colourings and Maximum permitted level colourings.

The re-categorisation to 4.3 Processed fruits and vegetables, will provide new permissions for colourings and additives in Coconut milk and coconut cream products including -

- Additives permitted at GMP
- Colourings permitted at GMP

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- Colouring permitted to a maximum level.

It is recommended that dietary modelling and risk assessment be conducted by FSANZ on the “Colourings permitted to a maximum level” in coconut milk and coconut cream products to establish the safety to consumers in Australia and New Zealand.

Heat treatment

For each item under 14.1.2 the GMP principle precludes the use of preservatives in juices represented as not preserved by chemical or heat treatment. If the coconut milk product is represented as not preserved by heat treatment, then the additives are not permitted to be used in that product.

The Codex Standard for Aqueous Coconut Products – Coconut Milk and Coconut Cream (Codex Stan 240-2003) requires an appropriate description of the heat treatment should be given, either as part of the name or in a prominent position in the same field of vision. Sodium benzoate is only permitted in pasteurised coconut milk by Codex Standards. The Food Standards Code does not have a specific regulation to require the heat treatment of coconut milk products to be labelled, but this may be regulated by general labelling requirements of not being misleading or deceptive.