

Summary

The Food Authority supports the majority of the changes proposed in P1013, and consequently for most of the proposed amendments has made no comment. The absence of comment in each case can be taken as support.

The NSW Food Authority does have specific comments relating to;

- the proposed definition of Good Manufacturing Practices in Standard 1.1.1;
- the amendment to clause 7 of Standard 1.3.1;
- the meaning of “specific name” in Clause 3 of Standard 1.4.2; and
- the proposed changes to the definition of oil in Schedule 5 of Standard 1.3.1.

Specific comments

[Issue 43] Standard 1.1.1, Clause 2 – definition of Good Manufacturing Practice (GMP)

The NSW Food Authority supports the intent of the proposed amendment but suggests that inclusion of the phrase ‘or processing aid’ in sub clause (b) is redundant and may cause confusion. This is because a processing aid will only be added to a food with the intention of accomplishing a physical or other technical effect in the finished food itself.

[Issue 45] Standard 1.3.1, Clause 7

The NSW Food Authority suggests this may be a typographical error. Should the amendment read – ‘an additive’ not ‘a food’

[Issue 24] Standard 2.4.1, Clause 3

It is not clear in this clause what is meant by the word “specific name”. The NSW Food Authority would like some clarification as what is meant by “specific name” and if it extends to wording such as “edible oil” and “vegetable oil” as well as oils labeled as “sunflower oil”, “olive oil”, etc. If it does not, there is a potential for the requirement in this clause for a “statement that describes the nature of any process which has been used to alter the fatty acid composition of the oil” to be circumvented if the marketer chooses to use the generic terms such as “edible” and “vegetable” in the ingredient list.

[Issue 60] Standard 1.3.1, Schedule 5

It appears that the proposed change of the definition for flavouring from “*impart taste and/or odour*” to “*impart taste or odour*” marginally narrows the substances covered by it, by excluding substances that influence both the taste and odour. As there appears to be no strong argument for the proposed changes, the NSW Food Authority suggests retaining the intent of the present wording (e.g. “*impart taste, odour or both the taste and odour*”).

Seamons, Colleen

From: Tina Harris [Tina.Harris@foodauthority.nsw.gov.au]
Sent: Monday, 24 January 2011 3:35 PM
To: submissions
Subject: P1013 Code Maintenance IX NSW submission
Attachments: P1013 Code Maintenance IX Assessment Report.doc

Hello,

Attached please find a submission in relation to the above from the NSW Food Authority.

Regards

Tina Harris
Policy Officer

NSW Food Authority

safer food, clearer choices

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