



SUBMISSION

Submission to Food Standards Australia New Zealand

P1021 Code Maintenance

July 2012

H.J. Heinz Company Australia Limited
2 Southbank Boulevard
SOUTHBANK 3006
VICTORIA AUSTRALIA

INTRODUCTION

H.J. Heinz Company Australia Limited (“**Heinz Australia**”), Heinz Wattie’s Limited in New Zealand (“**Heinz Wattie’s**”) and Golden Circle Limited are part of the H.J. Heinz global group of companies. Heinz Australia, Heinz Wattie’s and Golden Circle in this submission shall be collectively referred to as “**Heinz**”.

Heinz is one of the world’s leading producers of nutritious, convenient foods for every eating occasion and has been feeding families for more than 100 years. Heinz operates across the retail grocery and out of home channels, including hospitality and healthcare, and maintains #1 or #2 share in key categories including baby food, baked beans, tomato sauce and ‘wet’ soup.

With combined experience of over 140 years, Heinz provides a positive presence in the Australasian grocery products industry.

Heinz offers a diverse portfolio of brands, including:

Heinz	Wattie’s	Golden Circle	La Bonne Cuisine®
HP	Lea & Perrins	Greenseas	PMU
Epicure	Farex	Tom Piper	Hamper
Imperial	Ox & Palm	Petdeli	Cham
Chef	Pacific	Crown	LOL
Craig’s	Oak	Original Juice Co.	Popper
GC Raw	Mediterranean	Little Ripper	Gourmet
Breton	Master Chef	Wild Boy	Ice Magic
The Good Taste Company		Nurture	
Cottee’s (toppings, jelly and jams only)			

Heinz also manufactures and/or distributes products under licence from:

Weight Watchers	Complan
Eta	Rose’s (jams only)

The Heinz product range includes:

infant food	infant cereal	baked beans	canned pasta
soup	frozen vegetables	ketchup & sauces	canned fruit & vegetables
fruit juice	cordial	bottled water	corned beef
jams, jelly & toppings	frozen meals	canned seafood	

Heinz Australia and Heinz Wattie’s are members of the Australian Food & Grocery Council and the New Zealand Food & Grocery Council respectively.

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This submission relates specifically to the one year transition period that is provided by Standard 1.1.1 Clause 1(2). Heinz requests that the 12 month transition period is not solely applied to Proposal P1021 and that it be extended to include a further two years stock in trade provision.

The proposal to amend the INS number for the antioxidant 'tocopherols concentrate mixed', from 306 to 307b, will need to be reflected on food labels where this ingredient is present and labelled by its code number.

This ingredient is present and labelled as such in some of our food categories where shelf life is beyond one year and where we are already holding labels in stock for next production. Products that are affected include some that have less than a 12 month shelf life and others that have over a 2 year shelf life. Overall this proposal will affect over 40 skus within the Heinz Au & NZ collective business.

The short time frame of only one year will add significant cost of several thousand dollars to our business. This will also require the dumping of product and labels which Heinz wishes to avoid.

An extended stock in trade provision of two years would enable us to manage this change whilst minimising unnecessary cost.

Thank you for your consideration.

For further information, please contact:

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