



SUBMISSION

Submission to Food Standards Australia New Zealand

P1021 Code Maintenance

July 2012

Heinz Wattie's Limited
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AUCKLAND NEW ZEALAND

INTRODUCTION

Heinz Wattie's Limited is one of the world's leading producers of nutritious, convenient foods for every eating occasion and has been feeding families for more than 75 years.

Heinz Wattie's are a member of the New Zealand Food & Grocery Council

SUBMISSION

This submission relates specially to the issue of Stock in Trade. We request that the changes proposed in Proposal P1021, not be subject to Standard 1.1.1 Clause 1(2) but rather that an extended Stock in Trade provision be given of least two years.

The proposal to amend the INS number for the antioxidant tocopherol 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. For example, many of our dressings contain canola oil which is protected by this antioxidant and are currently labelled by code number 306.

This proposed change affects greater than 30 of our skus and the short time frame of only one year will add significant cost of several thousand dollars to our business.

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:

Julie North
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