



## SUBMISSION

To:  
**Food Standards Australia New Zealand**

In response to:  
Proposal P1025: Code Revision  
2<sup>nd</sup> Call for Submission

**September 2014**

H.J. Heinz Company Australia Limited  
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VICTORIA AUSTRALIA

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NEW ZEALAND

## PREFACE

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. Its key categories include 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	frozen vegetables	baked beans	canned pasta
infant formula	fruit drinks	ketchup & sauces	soup
fruit juice	cordial	bottled water	corned beef
jams, jelly & toppings	frozen meals	canned seafood	canned fruit & vegetables

Heinz Australia and Heinz Wattie's are active members the New Zealand Food & Grocery Council (NZFGC), Infant Nutrition Council (INC) and Australian Beverage Council Ltd (ABCL). Positions are held on various working groups, and Heinz contributes towards preparing submissions, opinion and information sharing, and strives to keep abreast of current and upcoming regulatory issues.

## OVERALL POSITION

Heinz welcomes the opportunity to make comment on Proposal P1025 Code Revision 2 Call for Submission. Heinz supports NZFGC, INC and ABCL submissions in principle. However there are some aspects of the draft variations to the Australia New Zealand Food Standards Code (Draft) which Heinz wishes to make further comment on. These comments make the body of this submission.

Supporting Document 3 Response to Submissions did not include comments on Standard 2.9.1, Standard 2.9.2 or Standard 2.6.1. Heinz would find this information useful and requests this be published in the future.

### 1. Commentary about specific sections of the Draft

## CHAPTER 1 Introduction and standards that apply to all foods

### Part 1.1 Preliminary

#### Standard 1.1.2 Definitions used throughout the Code

##### 1.1.2-4 Definitions of characterising component and characterising ingredient

As stated in the Heinz submission dated September 2013, Heinz does not support changing the term 'usually' to 'likely'. The meaning of these terms is different with the potential to change (increase) the number of characterising ingredients that must be labelled.

##### 1.1.2-11 Definition of *used as a food additive* etc

Heinz strongly supports the NZFGC's position on this matter.

##### 1.1.2-12 Definition of *used as a nutritive substance*

Heinz strongly supports the NZFGC's position on this matter.

##### 1.1.2-13 Definition of *used as a processing aid*

Heinz strongly supports the NZFGC's position on this matter.

#### Standard 1.2.7 Nutrition, health and related claims

##### 1.2.7-2 Definitions

This section does not appear to be in alphabetical order, see '*property of food*'; '*sugars*'; '*nutrient profiling score*'.

## **CHAPTER 2 Food Standards**

### **Part 2.9 Special Purpose Foods**

#### **Standard 2.9.1 Infant Formula Products**

**2.9.1 -11:** Subsection (1)(a)(ii) refers to “the table to section S30-08”, Heinz suggests that this requires amendment to “the table to section S30-07”.

### **Part 2.6 – Non-alcoholic beverages**

#### **Standard 2.6.1 – Fruit juice and vegetable juice**

**2.6.1 - 2.** Heinz has noted that the definition of ‘juice’ has changed from ‘undiluted juice’ to ‘original juice’. Heinz strongly supports the ABCL’s position on this matter.

### **Schedules**

#### **Schedule 17 Vitamins and Minerals**

**S17-2 and S17-3:** Biotin, Vitamin K, Chromium, Copper, Manganese, Molybdenum have not been included in the lists of permitted forms of vitamins and minerals, but in the current Code have been listed as ‘no permitted form specified’. Recommend they remain on the list with ‘no permitted form specified’ for reference.

#### **Schedule 30 Special purpose foods**

**S30-7:** Biotin and the permitted form d-Biotin are missing from the table, recommend they are included as per the current Code.

The permitted form of Calcium ‘calcium lactate’ is spelt incorrectly (calcium lactateerte).

**S30-10:** Nutrition Information Table (3). Corrections are required to the abbreviations to match the current Code: G to g, Mg to mg or µg as applicable.

## **2. Further discovery**

Heinz ask that FSANZ to note that comparing the Draft against the current Code for differences is not the same as applying individual ingredients/foods to the Draft for compliance. Heinz anticipates that it will identify more differences between the Code and the Draft as more products are reviewed and this is likely to occur after this submission.

For further information, please contact:

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