GME
GELATINE MANUFACTURERS OF EUROPE

5 September 2014

To the attention of the Food Standards Australia New Zealand (FSANZ)

RE GME's updated comments to the 2nd call for submissions – Proposal P1025 for Revision of the Australia and New Zealand Food Standards Code – notifications G/TBT/N/AUS/98 and G/TBT/N/NZL/69.

GME is the Gelatine Manufacturers Association of Europe and represents almost 100 % of the European gelatin production and 42 % of the gelatin production world-wide. We very much appreciate the possibility to comment on above mentioned draft resolution as follows:

1. **Section 1.1.2-3 and 2.10.4-2 Definitions:**

   The definition of gelatine is very broad in the document; therefore GME suggests replacing it with the definition applied in the European Regulation (EC) No 853/2004, Annex I):
   ""Gelatine" means a natural soluble protein gelling or non-gelling, obtained by the partial hydrolysis of collagen produced from bones, hides and skins, tendons and sinews of animals".

2. **Section 1.2.3-4 Mandatory declaration of certain foods or substances in foods:**

   GME proposes the following changes in order to be in line with the European Regulation (EU) No 1169/2011:

   - (1)(a): replace "added sulphites in concentrations of 10 mg/kg or more" by "sulphites in concentrations of more than 10 mg/kg".

   - (1)(c)iii: include fish gelatine in the exemptions as follows: "except for fish gelatin as a carrier for vitamins or carotenoid preparations, and as a fining agent in beer and wine" . The European Food Safety Agency (EFSA) has published scientific opinions justifying these exemptions. Therefore, these applications have been exempt from allergen labelling by Regulation (EU) No 1169/2011.

3. **Sections 1.6.1-1 etc. Microbiological limits (Pages 131 and 132):**

   This section contains microbiological limits and processing requirements for foods listed in Schedule 27 (page 533 etc.). As gelatine is not listed there, does this mean that there are no microbiological limits for gelatine in AUS/NZ?
   GME would like to propose as a limit for Salmonella negative in 25 g (n=5 c=0 and m=0) as mentioned in European Regulation (EC) No 2073/2005.

4. **Section 2.2.1-11 Sourcing requirements:**

   GME proposes to clarify the definition for "Bovine must be free from bovine spongiform encephalopathy" to avoid further misunderstanding and suggests the following:
   "Bovine must be free from bovine spongiform encephalopathy i.e. bovine must not have been tested positive for BSE".

5. **Schedule 18 Processing aids (pages 384-406):**

   In order to ensure that all processing aids necessary for gelatin and collagen production are included in this chapter, GME would like to provide the following comments:

   - S18-2 Processing aids that can be generally used: This paragraph does not include:
     - Lime (calcium hydroxide) which is used for the alkaline pre-treatment of raw materials
     - Cellulose which is used as filtration aid e.g. like perlite.
     - Hydrochloric acid (HCl) which is used for bone demineralisation and thus an important processing aid for the production of bone gelatine.

   - S18-8 Permitted extraction solvents: As gelatin is extracted with water, this paragraph may also contain water as an extraction solvent.

   - S18-9 Processing aids for various purposes: Both hydrogen peroxide and sulphur dioxide are used as well as anti-microbial agents for the manufacture of gelatin and collagen. Therefore, maximum limits of 50 mg/kg (SO_2) and 10 mg/kg (H_2O_2) have been included in European Regulation (EC) No 853/2004. GME would like to propose to include this application for both substances in this paragraph as well.

We thank you in advance for your attention and consideration of this important matter and would be pleased to discuss this further should you consider this beneficial.

Yours sincerely,

Marc Vermeulen,

GME Secretary General