

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

P O BOX 4107,
FRANKSTON HEIGHTS,
VIC 3199
TEL/FAX: 03 5971 5817
EMAIL: fta@ftaus.com.au

SUBMISSION

21 July 2015

Attention: **Project Manager P1038**

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia
2610.

Re: Vitamin & Mineral Claims and Sodium Claims about Food Containing Alcohol

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee reviewed this document and in general agreed with the suggested amendments to *Australia New Zealand Food Standards Code – Transitional Variation 2015*, whilst providing the following additional comments for consideration prior to finalisation of the Standards:

1. These amendments should be a temporary solution, with a set date of 2 years for the trial, to review what effect the changes were having in the market place.
2. The mandatory minimum serve sizes may need to be revisited to prevent the abuse that can be created.
3. Any further changes to serve sizes/reference quantities should be the subject of Applications so as to ensure a full impact statement is provided.
4. A definition for “beverage” must be included in the revised Standards due to:
 - (a). ‘Food’, as per its definition, means all foods including “beverage” which term is not separately mentioned in the definition for ‘food’.
 - (b). In the proposed amendments in Standard 1.2.7 (c) (ii) it states “...about a food that is not a beverage”. This phrase can only be meaningful provided a definition of “beverage” is elsewhere provided, as “food” per se includes ‘beverages’ and a “food that is not a beverage” means that a beverage is not a food and such an interpretation is circular and cannot exist.
5. It is noted that particular ‘soy sauces’ contain alcohol and are liquid foods but would not be consumed in the same manner as many other liquid foods and therefore must somehow be distinguished in the definition of a ‘beverage’.

If there are any queries regarding this submission, please contact the Technical Secretary, [REDACTED], [REDACTED].

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

Del Teesdale– President
Food Technology Association - Australia