

30 October 2015

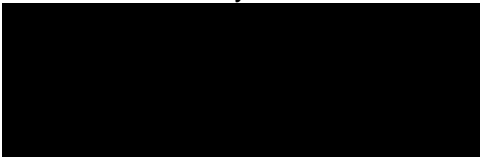
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Proposal P1040: Code Revision – consequential & corrective amendments II.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**CALL FOR SUBMISSIONS – PROPOSAL P1040: CODE REVISION –**  
**CONSEQUENTIAL & CORRECTIVE AMENDMENTS II**

**30 October 2015**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Proposal P1040: Code Revision – consequential & corrective amendments II***.

### **New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

### **The Proposal**

FSANZ published a revision of the *Australia New Zealand Food Standards Code* (the P1025 Code) to replace the current Code on 1 March 2016, when the current Code will be repealed. Some minor typographical and transcription errors have been identified and a draft variation has been prepared to amend these errors. The proposal does not impose any new requirements.

### **Comments**

In general, the draft variation has been prepared to correct errors that go to:

- references elsewhere in the P1025 Code (eg in **Subsection 1.1.2—2(3)**, Omit ‘1.2.1—6(4)’, substitute ‘1.2.1—6(3)’ or
- typographical changes (eg **Section 2.4.2—2 (Note)**, Omit ‘**edible oil spread**’, substitute ‘**edible oil spread**’) or
- grammatical errors (eg **Paragraph 2.9.4—6(2)(a)**, Omit ‘of reconstitution’, substitute ‘or reconstitution’).

NZFGC supports the amendments to ensure that the P1025 Code is as accurate as possible for commencement. NZFGC recognises that further amendments to ensure currency may need to be made prior to commencement on 1 March 2016.