



15 October 2012

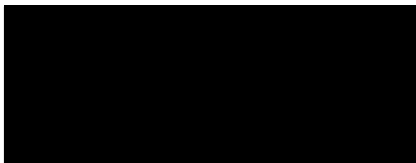
Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Assessment Report for **Application A1070** *Packaging Size for Phytosterol-enriched Lower Fat Cheese*.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
**APPLICATION A1070 PACKAGING SIZE FOR PHYTOSTEROL-
ENRICHED LOWER FAT CHEESE**
Safety Assessment Report
19 October 2012

The New Zealand Food & Grocery Council (the "NZFGC") welcomes the opportunity to make a submission on *Application A1070 Packaging Size for Phytosterol-enriched Lower Fat Cheese*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates \$28.7 billion in the New Zealand domestic retail food, beverage and grocery products market and \$26.3 billion in export revenue from exports to 183 countries. 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.

Food and beverage manufacturing and wholesaling in New Zealand directly employs 104,160 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to 344,820 in 85,252 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1070

The NZFGC understands that there is a close parallel between this application and Application A1065 on the packaging size for phytosterol-enriched milk recently completed by FSANZ. As a result, NZFGC notes that FSANZ did not undertake a new risk assessment and has concluded that it is appropriate to remove the portion weight restriction for phytosterol-enriched cheese and cheese products.

Comments

The NZFGC supports the conclusion reached by FSANZ that would see the Australia New Zealand Food Standards Code amended to remove the portion weight restriction for phytosterol-enriched cheese and cheese products.

NZFGC appreciates that when phytosterols were proposed for addition to foods in 2004 there was a general concern across Australian jurisdictions and New Zealand about safety. We note that at that time, post-market monitoring in Europe (where a broader range of phytosterol-enriched foods had been available for some time) showed that consumers

welcomed choice of products, and over-consumption did not occur. We note also that the mandatory advisory label statements which advise that the product should be consumed as part of a healthy diet and may not be suitable for children under the age of five years and for pregnant or lactating women is remaining in place. As well fat content restrictions will also remain in place.

It is interesting to see the variety of packaging available in Europe and the opportunity for choice that changing the regulations in New Zealand and Australia might engender. The NZFGC also notes the consumer concerns about excessive packaging and this amendment has the unintended consequence of delivering more efficient packaging to consumers.

It is important to note that, as with phytosterol-enriched milk, consumers who are using these cheese products seem to be well aware that 'more is not better' and that plant sterols do not provide additional benefit when consumed in excess of 3 g per day.

The NZFGC is pleased to note the research suggests that where phytosterol-enriched cheese is bought by households in the >55 years age group, that alternative non-enriched cheeses are also purchased for non-target members of the household thereby reducing the prospect that the enriched products would be consumed by children. This would accord with the higher cost of the enriched products and the importance that households would place on separating these specialty foods on the basis of cost.

Any increased consumption occurring in the target population is supported on the basis that this is likely to deliver additional benefit.

Conclusion

The NZFGC supports choice in the market place and for manufacturers. On this basis and in the absence of safety concerns, the NZFGC supports the amendment to the Australia New Zealand Food Standards Code that would remove the portion weight restrictions on phytosterol-enriched cheese and cheese products.