

19 March 2018



Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

By Email
submissions@foodstandards.gov.au

Dear Sir / Madam,

Re. Application A1144 Re-categorising coconut milk for food additive permissions

The Australian Beverages Council (ABCL) is the peak body representing the collective interests of the non-alcoholic refreshment beverages industry. Our membership is comprised of multi-national companies, small and medium business, making up over 95% of the non-alcoholic beverage industry's production volume in Australia.

It is understood that the FSANZ are assessing an application to consider whether the food category for food additive permissions for coconut milk products is more appropriate under fruits rather than beverages.

The ABCL, acting on behalf of the non-alcoholic refreshment beverages industry in Australia would like to show our support for the use of emulsifiers, stabilisers and thickeners in coconut milk. As the application before you states, these additives are necessary to ensure that the water and fat components remain combined as consumers expect.

The ABCL does not however agree with the following statement made in the application:

"Canned coconut milk products are not positioned on shelves in the drinks or beverage section of any supermarket or available for sale in the refrigerated drinks zones of any retail outlet. They are not marketed or sold as drinks for human consumption and indeed, would not be regarded as fit or suitable for drinking."

The ABCL notes that some consumers have a belief that coconut products provide unique natural health benefits. This has caused an increase in the number of food products that contain coconut ingredients. In addition to this many consumers are becoming increasingly concerned with animal welfare and look to decrease their consumption of animal products. This has led to a rise in milk alternatives such as soy and nut milks. Coconut milk is another milk alternative and can be found in the chilled section of the supermarket near bovine milk. Although these



products are not found in a can, the packaging format of the product is irrelevant to the categorisation.

Currently, there are several coconut milks that are ready to drink on the market in Australia. These beverages contain emulsifiers, stabilisers and thickeners which include the following:

- Carrageenan,
- Xanthan gum,
- Guar gum,
- Gellan gum,
- Locust bean gum,
- Sodium alginate,
- Lecithin,
- Mono- and diglycerides of fatty acids,
- Sucrose esters of fatty acids.

It is noted that CODEX STAN 240-2003 Standard for Aqueous Coconut Products states that it applies:

“to packaged aqueous coconut milk and coconut cream products”, but “does not apply to the product when indicated as being intended for further processing or to sweetened and/or flavoured coconut milk or cream”.

Many of the coconut milk beverages on the market are sweetened and/or flavoured. The ABCL wish FSANZ to consider this definition as a possible way to differentiate between coconut milk that is used for cooking purposes and those products which are to be consumed as a beverage. Within CODEX STAN 192-1995 coconut-based drinks are categorised under 14.1.4.2 (Non-carbonated water-based flavoured drinks). Coconut water is considered under 14.1.2.1 (Fruit juice). We would reiterate the importance of the use of emulsifiers, stabilisers and thickeners in coconut milk beverages.

The ABCL also feel that further consideration is required pertaining to other food products manufactured from coconuts such as coconut water. The ABCL feel that:

1. Coconut water should remain under subcategory 14.1.2.1. (Fruit and vegetable juices) given the nature of the product.
2. Products that contain coconut water with additional ingredients, such as sugar, would fall within the requirements of subcategory 14.1.2.2 (Fruit and vegetable juice products) and therefore be allowed to contain the additives as outlined in the relevant category of Schedule 15 in the Food Standards Code.
3. Water based beverages that use coconut products, such as those produced from soaked and milled coconut meat, would remain under 14.1.3 (Water based flavoured drinks) and therefore would also be allowed to contain additives as per Schedule 15.



We request FSANZ to give further consideration to the categorisation of other food products taken from coconuts while assessing this application to avoid further confusion.

The ABCL would also like to raise that if the intent of the amendment of the standard is to align with Codex, there are notable differences between what is currently proposed in the redrafting of the Food Standards Code and the permission in Codex. FSANZ state in the call for submissions that transfer to 4.3 (Processed fruits and vegetables) will decrease the maximum permitted level of sulphites from 115 to 30 mg/kg to align with Codex. However, no such statement is made regarding the use of sorbic acid, benzoic acids, polyoxyethylene sorbitan monolaurate or polyoxyethylene sorbitan monopalmitate, which are also treated differently by Codex. Only pasteurized coconut milk can contain sodium benzoate according to Codex, while in its proposed categorisation (4.3.0.5) coconut milk would be permitted to contain benzoic acid to 1000 mg/kg. The limiting of the permission for benzoates does not appear to be captured in the proposed drafting of the revised standard. Codex does not permit the use of sorbates, whereas sorbic acid is proposed at 1000 mg/kg, therefore retaining the current permissions by the Food Standards Code. Polyoxyethylene sorbitan monolaurate and polyoxyethylene sorbitan monopalmitate are permitted for use in coconut milk according to Codex. These are not however permitted in Schedule 16 of the Food Standards Code. While we support the proposal that it is more appropriate for coconut products (with the exception of coconut-based beverages) to be categorised under 4.3 (Processed fruits and vegetables) we feel further thought needs to be given as to whether a direct transfer of the current permissions for use of sorbates and benzoates from the 14.1.2.1.1 is relevant to these products based in technological need. Further alignment with Codex which would allow for the use of polyoxyethylene sorbitan monolaurate and polyoxyethylene sorbitan monopalmitate also requires consideration.

We thank FSANZ for the opportunity to provide this submission in support of the use of emulsifiers, stabilisers and thickeners in coconut milk. However, we highlight the need to consider the categorisation of other products taken from coconuts and their use by the beverage industry. If you wish to discuss any aspects of this correspondence, please contact me on

Kind regards,

