

HEALTH PROTECTION DIRECTORATE

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
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Dear Sir / Madam

Submission – Proposal P1013 – Code Maintenance IX

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Proposal P1013.

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies and includes expert input by Queensland Health Forensic and Scientific Services.

After considering the documentation, Queensland supports Option 2 – To prepare draft variations to the Code to incorporate the proposed amendments.

However the following issues need to be noted:

In 3.11 (Standard 1.2.10 – Characterising Ingredients and Components of Food), we agree with the recommendation to require declarations of characterising ingredients of 5% or greater to be rounded to the nearest whole number.

In 3.12 (Standard 1.2.11 – Country of Origin Requirements) – Issue 42, Table to subclause 2(2) relates to “wherever ‘a mix of local and/or imported foods’ occurs” and states “OLDP recommendation to clarify meaning of ‘and/or’ ”.

The solution being proposed is to “Replace with ‘a mix of local and imported foods’ ”.

However, it needs to be acknowledged the current standard applies in the case of (i) a mix of local foods or (ii) a mix of imported foods or (iii) a mix of local and imported foods. The proposed variation will remove provisions (i) and (ii) above, which means that a food such as Seafood Marinara Mix would need to be labelled with all the countries of origin where the ingredients are imported (instead of “a mix of imported foods”) and be labelled “Product of Australia” if all local ingredients are used (instead of “a mix of local foods”). This is a significant change and warrants further consideration.

In 3.14 (Standard 1.3.2 – Vitamins and Minerals) – Issue 63, Table to clause 3 states “OLDP recommendation to clarify meaning of ‘and/or’ ”.

The solution being proposed is to “Replace ‘and/or’ with ‘or’ ”.

However, it needs to be acknowledged there can be vegetable juice/drink or there can be fruit juice/drink and there can be a combination of vegetable juice/drink and fruit juice/drink. This is a significant change and warrants further consideration.

In 3.32 (Standard 2.5.4 – Cheese) – Issue 102, states “The definition refers to ‘milk and/or materials obtained from milk’. OLDP recommendation to clarify meaning of ‘and/or’ ”.

The solution being proposed is to “Replace ‘and/or’ with ‘or’ ”.

However replacing ‘and/or’ with ‘or’ may not accurately reflect current or future practices of making cheese with milk and additional materials derived from milk such as casein. This matter requires further consideration.

In 3.44 (Standard 2.9.4 – Formulated Supplementary Sports Foods), – Issue 124, paragraph 7(3)(a) refers to: “the product is useful either before, during and/or after sustained strenuous exercise. OLDP recommendation to clarify meaning of ‘and/or’ ”.

The solution being proposed is to replace the wording with “the product is useful for one or more of before, during, or after sustained strenuous exercise”. This could be better worded.

[47] Standard 3.2.1 relates to clause 6 Fund raising events. However the proposed substitution refers to “a fundraising event”. There is a need for consistency.

Yours sincerely

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