

4 July 2012

Food Standards Australia New Zealand
P.O. 10559
The Terrace
Wellington 6143

Re: FAO Manufacturers and user of antioxidant tocopherol concentrate, mixed (306)

FSANZ's proposal to update and align tocopherol concentrate, mixed (306) to Codex is considered by Bakels Edible Oils (BEO) as a good idea in principle. However the timeframe allowed for changing over of packaging associated with the change is considered too short.

Bakels would like to recommend that a change over period of 2-3 years be considered.

At BEO we have approximately 300 products, 80% of which contain mixed tocopherols and are labeled as Antioxidant (306). The majority of our products are sold to customers for further processing, and many of our customers are putting the affected product into not just one but several different product lines. Making this one small change will affect thousands of products.

The paperwork and packaging associated with this change is extensive. At BEO we will need to update technical data sheets, product information forms, manuals and packaging for approximately 300 products. Also BEO will need to send letters to customers informing them of the change, which is a major undertaking. It costs money and resources to update all of these facets.

BEO is predominately concerned over the proposed change over period, which is a maximum of 12 months. Due to the minor typographical inconsistency of the change, this would typically be carried out by our company when other changes to the packaging are required. In doing so a 12 month period is not sufficient to run out of existing packaging and make the change over.

BEO would inform customers of the change when it came into effect to give them the maximum amount of time to comply with the change.

BEO agree in principle with the change to align the FSANZ Food Code to Codex; however the Standard Stock in Trade Provision will need to be extended for this minor typographical inconsistency.

Regards,



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