

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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SUBMISSION

2 July 2015

Attention: **Project Manager P1037**

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia
2610.

Re: Amendments Associated with Nutrition Content & Health Claims

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee reviewed this document and provided the following comments for submission:

Re Table 1 on page 4 of 'Call for Submissions' document and using the 'Code Reference' in Column 1 of the Table as a referral point for the following comments:

1. 'Standard 1.2.7, Schedule 1,' – Committee agrees with Proposed Amendment.
2. 'Standard 1.2.7, Schedule 5.' - Committee agrees with Proposed Amendment re clarification.
3. 'Standard 1.2.8, Clause 7B.' – Committee agrees with Proposed Amendment except concerning the comment that once a statement is shown “outside the NIP”. In this case, that statement then becomes a “claim” or a “nutrition claim” and this may introduce consequential ramifications.
4. Standard 1.2.8, Conditions for Small Packages, Clause 8.' - Committee agrees with Proposed Amendment.
5. 'Standard 1.2.8, Conditions for Small Packages, Clause 8.' - Committee agrees with Proposed Amendment but considers the change to be a matter of semantics rather than permitting alterative interpretations.
6. 'Standard 1.2.8, Conditions for Small Packages, Clause 8A.' - Committee agrees with Proposed Amendment.
7. 'Standard 2.9.2, Clause 9' - Committee agrees with Proposed Amendment.
8. 'Standard 1.2.7 Clause 5 and Standard 1.2.8 Clause 4' – Committee did not agree with the Proposed Amendment, due to:

(i). As the “HSR” is entirely voluntary at this stage and for a further minimum of two years, then introduction of an exemption is considered unjustifiable whereas otherwise this type of labelling is mandatory.

- (ii). The suggestion of the exemption ignores the fact that a Nutrition Information panel will still be required which essentially show the same values.
- (iii). The Star Ratings, as they are voluntary and not mandatory are in fact “nutrition claims” and subject to the relevant clauses.

If there are any queries regarding this submission, please contact the Technical Secretary, [REDACTED], Telephone (03) 9532 8213, [REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

Del Teesdale– President
Food Technology Association - Australia