

Attachment 3

PUBLIC COMMENT RECEIVED

PROPOSAL P150

ANZ STANDARD FOR FOOD ADDITIVES

	Submittor	Comments
1	Bush Boake Allen Australia Ltd Dandenong, Victoria	Identify (chlorophylls) 140i and (chlorophyllin)140ii rather than 140 chlorophylls in the standard - consistent with EU nomenclature. Request to include alkali salts chlorophyllin CI 75810 (E140) Natural Green 5
2	DAA Dieticians Association Australia	General: supports P150 format & toxicological evaluations.
3	Reckitt & Colman Australia	Request to include 300 Ascorbic Acid in jalapeno pepper based sauces max level 25 mg/100mL.
4	Farm Pride Australia	Triethyl citrate (1505) in liquid egg white and dried egg white omitted from schedule 2 of P 150 Request to include Sodium lauryl sulphate in liquid egg white and dried liquid egg white.
5	K Richardson, CSIRO, Sydney	Queries inclusion of nitrites in cheese. Queries 3.1.2 Ice Confection - should this refer to ice confection mixes? "The ANZFIS hierarchical categorisation of foods may look very neat but it has no technological justification". eg. colours to canned fruits, veges, jams and jellies, processed fish and fish products, semi preserved fish and fish products, fully preserved fish including canned fish products, fruit and vegetable juice products. Queries use of nisin in vegetable preparations. Questions increased list of additives permitted in sauces. Questions increase of nitrate use in processed meats - "...not technically justified; it makes enforcement of legislation regarding nitrite levels extremely difficult; it would contribute unnecessarily to the nitrate burden in the diet".

6	E Attwood, Consumer advocate, S.A	<p>Queries effectiveness of GMP and additives: eg. gelling agent in fruit pies. Suggests GMP will not work.</p> <p>Does not support general standard for food additives being based upon the food classification system. Questions how manufacturers can justify use of additives under GMP.</p> <p>Suggests that many additives included not for consumer benefits, rather for industry 'innovation' to expand sales.</p> <p>Suggests pharmacological testing for food additives.</p> <p>Suggests that case-by-case allocation of additives more in line with ANZFA objectives (re. public health and safety).</p> <p>Queries inclusion of intense sweeteners, esp. aspartame (re. suggested health implications - brain tumors).</p> <p>Colours with reported adverse effects: caramel III, carbon black, curcumin, saffron, crocin, annatto, lutein, tartrazine, carmoisine, allura red AC, brilliant blue FCF, brown H7, fast green FCF, green S, indigotine, ponceau 4R, quinoline yellow, amaranth, sunset yellow, brilliant black BN.</p>
7	Sealord Shellfish Ltd NZ	Request sulphur dioxide 1000ppm in canned abalone (bleached paua) in line with NZFR
8	Food Technology Association, Victoria, Inc	<p>Requests to reintroduce colour erythrosine for limited applications</p> <p>Comments on the appearance of (0143) Fast Green FCF in schedule 4 without prior notice</p> <p>Suggest an extra schedule listing of additives showing which products are permitted to contain that additive and the associated permitted levels. (similar to previous NHMRC regulations.)</p> <p>Notes that several colours now have maximum limits set annatto, sunset yellow, brilliant black, caramel, amaranth.</p> <p>In favor of use of term 'intense sweetener'</p>
9	Palsgaard Industri A/S, DK, Denmark	476 PGPR in 5.1 Cocoa and chocolate products at 4000mg/kg. Currently permitted in Aust and NZ. Suggest that perhpas E477 may have been confused with E476, as E477 not used commonly in confectionery products.

10	National Council of Women of Australia Inc Ltd	<p>Suggests objective of ANZFA should include “safe and nutritious food for all” (as per recommendations of World Food Summit).</p> <p>Endorses use of paragraph 1 of GMP in code; cites example of fruit fillings in pies to question GMP effectiveness as regulatory measure.</p> <p>Suggests that P150 does not address issue of reduced quality of foods with use of food additives; does not support use of additives that are linked to a technological function - suggest more prescriptive code; suggest criteria be set for assessing technological justification of use of food additives.</p> <p>Suggests effect of additives on nutritional value of foods be addressed; suggests pharmacological testing; suggests additives used with insufficient data to merit use; suggests that use of food additives be incorporated into HACCP for monitoring and compliance justification.</p> <p>Suggests colours banned overseas yet allowed in P150 will hinder international trade; queries inclusion of caramel III, carbon black, curcumin, saffron, crocin 160b, annatto 161b, lutein, tartrazine, carmosine, allura red AC, brilliant blue FCF, brown HT, fast green FCF, green S, indigotine, ponceau 4R, quinoline yellow, amaranth, sunset yellow, and brilliant black BN.</p> <p>Concerned that P150 allows more additives in more foods - suggests this is not consistent with objectives of ANZFA</p> <p>Lack of consistency in proposal; confusing.</p> <p>Suggests that secondary processing of foods may allow prohibited additives due to hierarchy of list.</p> <p>Queries inclusion of aspartame due to (possible) recent research linkage to neurological damage in children.</p>
11	Tall Bennett Group Australia	<p>Request gum acacia (414) in 14.1.4 F&V juice and F&V juice products as a source of soluble fibre. Suggest dietary fibre be recognised as a technical function for a food additive.</p>

12	Goodman Fielder Sydney, NSW	<p>General: supports alignment with Codex Alimentarius and EU; supports introduction of GMP; support food identification system; support categorisation of food additives into five groups.</p> <p>Suggests change to definition - "maximum permitted limit", as term in P150 is "maximum permitted levels".</p> <p>Clarify clause 6 applied to colours</p> <p>Cat 0 include essential oils</p> <p>Cat 1.3.1 reinstate carageenan 407 and add PES 407a</p> <p>Cat 1.3.2 beverage whiteners inappropriate classification should go to 1.5 (cream powders etc)</p> <p>Cat 2 BHT 100 mg/kg and ascorbyl palmitate GMP permitted in fats in general in NZ so should be moved from Cat 2.1 to 2</p> <p>Cat 2.1 shortenings - reinstate 477 propylene glycol esters - GMP or add to schedule 2 (ADI high)</p> <p>Cat 2.2 50% oil is arbitrary. 2.2 should simply be fat emulsions without qualification.</p> <p>Cat 2.2.1 includes margarine so reinstate propylene glycol esters - 477 GMP as in FSC and NZFR</p> <p>Cat 2.2.2 should just be fat emulsions <80%oil. propose add nisin GMP. some products veg. analogues of dairy emulsions where nisin is permitted. reinstate 477 propylene glycol esters - GMP</p> <p>Cat 2.3-2.4 could be combined if >50% fat qualification removed.</p> <p>dips pH<4.5 benzoic acid 700 mg/kg</p> <p>imitation cream methyl ethyl cellulose 9000 mg/kg</p> <p> polyglycerol esters 5000 mg/kg</p> <p>Need schedule 4 colours if not permitted in cat 2</p> <p>Sweetened coconut (cat 4.3.8) - could probably be listed in Cat 4.3.1</p> <p>Cat 6.1 meals are better included in 6.2</p> <p>Cat 6.3 includes cereal based extruded snack foods annatto 100 mg/kg.</p> <p>Schedule 4 colours should be 290 mg/kg not GMP</p> <p>Cat 7 lactylates limited to 4000 mg/kg but in NZ no limit set - suggest GMP.</p> <p>baking compounds out of place - should be in Cat 0</p> <p>baking compounds should permit Sch 2 additives and aluminium sulphate (component of sodium aluminium phosphate baking compounds)</p>
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	<p>Goodman Fielder Sydney, NSW</p> <p>continued...</p>	<p>Cat 7.1.1 plain breads Sch 2 additives or a range of specific emulsifiers, veg. gums and other additives permitted in FSC B1 and in NZFR. Specific omissions are acetic acid, sodium diacetate, potassium chloride, diacetyl tartaric esters of fatty acids, mono-and di glycerides, sorbitans and polysorbates, veg. gums (FSC A10 group 1)</p> <p>Cat 7.2 Pregelatinised starches not in Sch 2 - does this mean pregelatinised native starches considered foods. What about pregelatinised modified starches?</p> <p>Cat 11 in NZ manufacture Honey powder which contains dextrins and incidental occlusion of nitrogen - propose cat 11.3.1 Honey powder</p> <p>Cat 12.5 add 481 sodium lactylates GMP in dried yeast</p> <p>Cat 12.6 gelatine incorrectly placed should be in cat 8, eg 8.5 after edible casings, as in EU.</p> <p>Jelly in cat with salt condiments etc inappropriate but no better suggestion. Need entry for jelly for intense sweetener permissions.</p> <p>Cat 14.1.3.3 need to make clear that levels of colours permitted are on basis of when made up for consumption not as sold</p> <p>Cat 20 group mayonnaise, salad dressings, sauces and toppings not elsewhere standardised together.</p> <p>Schedule 2 include 477 propylene glycol esters - relatively high ADI and few uses (shortenings, margarines and table spreads).</p> <p>Also consider including ascorbyl palmitate, polyglycerol esters (475) and polyglycerol esters of ricinoleic acid (476)</p> <p>Schedule 3 add Al, Au, Ag.</p> <p>Schedule 4 - clarify aluminium and calcium lakes also permitted.</p>
13	Hoechst Australia Ltd	<p>Consideration of Ace K's role as a multi-sweetener for blends - ADI will never be exceeded so should be included in Schedule 2 with aspartame and sucralose for specific use in breakfast cereals, mixed drinks, alcoholic drinks, soft drinks, fruit juices, reduced calorie or sugar free foods, diet foods, and ESL food products.</p>

14	Qld Health, Environmental Health Unit	<p>General: support use of schedule 2 with GMP</p> <p>Clause 6 unclear and open to misinterpretation - proposed clause 3(b) of Standard A4.</p> <p>need to stipulate how concentrations of grouped additives are to be expressed when limits are set (eg sulphites as sulphur dioxide)</p> <p>a tabulation by additive function would also be useful as would a listing of additives in alphabetical order.</p> <p>non-natural food additives should not be used without substantial justification, especially when use is cosmetic eg food dyes. Proposed list of foods in which artificial colours should not be permitted.</p> <p>Flavour enhancers should also be subject to more scrutiny in use - suggested list of foods in which flavour enhancers should not be permitted. Suggest flavour enhancers taken out of schedule 2.</p> <p>Intense sweeteners - support use in foods subject to energy claim but not in foods without added sugar may add significantly to use. Could lead to development of undesirable taste preferences in childhood possibly leading to increased risk of obesity, diabetes and dental caries. List of foods where intense sweeteners inappropriate proposed.</p> <p>Sch 2 Cupric sulphate should be case by case approval</p> <p>Cat 5 permits Al. Al link to Alzheimers Disease and Al powder can react with acids in digestive system - easily assimilated. Since use purely cosmetic suggest deletion from std.</p> <p>Nitrates limit to slow dried air cured meats and uncooked fermented meats where serious risk of clostridium botulinum exists</p> <p>Sulphur dioxide use in uncooked comminuted meat products should be limited to those containing farinaceous substances as in current FSC.</p>
15	Queensland DPI, Centre for Food Technology	Extend current FSC permission for sulphur dioxide in frozen avocado pulp, puree or spread to frozen avocado halves and slices or pieces.
16	The Stroh Brewery Company, Michigan, Detroit	Support the use of sodium benzoate and potassium sorbate (to a total of 1000 ppm) in Mixed Alcoholic Drinks Not Elsewhere classified (section 14..3)
17	Applied Technical Products, Australia	Request the inclusion of polyglycerol esters of interestified ricinoleic acid (E 476) as a permitted ingredient for cocoa and chocolate product.
18	Simplot Australia	Processed fruits and vegetables allows schedule 2 additives, same treatment for processing fresh herbs?

19	Cadbury Confectionary Ltd, NZ	<p>476 polyglycerol polyricinoleate (PGPR) to be included as emulsifiers listed for cocoa and chocolate products. (Limit 5000 mg/Kg)</p> <p>Schedule 4: amaranth to be included in the list of permitted colours for confectionery (Limit 290 mg/kg)</p> <p>Sorbic acid and sorbates use to be extended to all confectionery rather than restrict its use to confectionery with sugar content > 50%. The term sugar used in confectionery to be qualified.</p>
20	The Nutra Sweet Kelco Company, Vic. Aus	<p>General: support P150 move towards international trends; agree with technological purposes listed for intense sweeteners in intro. of proposal; support food identification system.</p> <p>Flavour enhancement purposes of intense sweeteners aspartame and thaumatin in attachment 2, to be included in the draft std, as attachment 2 is not part of the draft std.</p> <p>Request aspartame to be included to the level of 100 ppm as flavour enhancer according to current NZ Regs 252A .2.e</p> <p>Entry 11.4 'non-sugar sweeteners' to be converted to 'table top sweeteners' to reflect sugars used as carriers in the product.</p> <p>Bases for table top sweeteners currently restricted to specific sugars. Other vegetable oils and sugars to be considered.</p> <p>Aspects of standard A8 not covered in clause 7,8,6 & 6a.</p> <p>Term 'Artificially sweetened ' is redundant in clause 6a.</p> <p>Queries the need for paragraph 6c, products containing aspartame to be labelled 'phenylketonurics contains phenylalanine' . States is unnecessary to include on labelling.</p>
21	Prepared Foods Ltd, NZ	<p>Suggests the proposed amount of sulphites (excluding calcium metabisulphite) in canned Haliotis abalone with dark pigmented flesh from 30 mg/kg to 1000 mg/kg. Justification: industry worth NZ\$50 million; research not found viable alternative.</p>

22	Natural Food Colours Association (NATCOL), Switzerland	<p>EU regulations severely restricts certain additives because of different food consumption patterns; true of annatto, where maximum levels should apply to food ready to eat.</p> <p>Request inclusion of lycopene as food colour.</p> <p>Requests clarification of 160 and 160a in carotene section schedule 3.</p> <p>Include annatto in dairy based desserts such as ready made custard; decorations and coatings to the level 20 mg/kg; extruded puffed and/or fruit flavored breakfast cereals to the level 25 mg/kg.</p> <p>Are breadcrumbs in cat 6.3/4?</p> <p>Revised standard states that foods intended for particular nutritional uses should not be coloured Clarification required if this includes food for diabetics or slimmers.</p> <p>Clarification required for savoury snack products. Do they belong in category 20? as otherwise colouring will not be permitted for single food snacks.</p>
23	Beer Wine and Spirits Council of New Zealand	<p>Acceptance of P150 conditional on:</p> <ul style="list-style-type: none"> * That all additives and additive levels approved under the New Zealand regulations continue to be permitted by the joint additives code. * That the joint code on additives does not breach rules underlying TBT and the WTO trade regime. <p>Addition of the following to schedule 2: B-glucanase, hemicellulase., yeast food (0.3 ppm zinc sulphate/chloride); water conditioner calcium chloride, acetolacetate decarboxylase enzyme or maturex.</p> <p>Aspartame, sucralose to be permissible in general alcoholic drinks (regulation 235)</p>
24 & 25	BRI Australia Ltd Bakels, NZ	<p>General: strongly support horizontal standards; support simplification of code; support GMP principles - promotes product development and innovation.</p> <p>Request clarification of "plain breads" and "fancy breads".</p> <p>Clarification in attachment 1 of maximum level they prefer it to refer to 'maximum amount in food as sold' other than maximum added</p> <p>Request lecithin as emulsifier/surfactant in all breads in std B1.</p> <p>The following are omitted:</p> <p>Bread in Australia: acetic acid, sodium and calcium oleyl lactylate and sodium and calcium stearoyl lactylate, sorbitans and polysorbate specified in A10, sorbic acid and its salts, vegetable gums in group 1 of standard A10.</p> <p>The following may be included are foods; if not, request that these be included as additives: barley malt flour, edible fats, eggs, enzymatically active soya bean preparation, gluten, lupin flour, lupin kernel flour, lupin kernel meal and lupin hulls, milk and milk and milk products, malt extract, salt, sugars, vinegar, wheat malt flour.</p>

	<p>BRI Australia Ltd</p> <p>Bakels, NZ</p> <p>continued...</p>	<p>Specialty bread: phospholipids derived from natural sources, propylene glycol mono and di esters, pregelatinised starches.</p> <p>Bread in New Zealand: Lecithin, monoglycerides and diglycerides and their diacetyl tartaric acid esters. Calcium and sodium salts of fumarates, azodicarbonamide, ammonium chloride, monocalcium phosphate, citric acid, L-cysteine, ascorbic acid,.</p> <p>* currently classified as processing aids.</p> <p>The following may be included are foods. edible oils, fibre derived from other foods, pea flour and fractions of pea flour.</p> <p>NOTE: caramel may be used in NZ speciality breads</p> <p>Biscuits and cakes in Australia: potassium diacetate, artificial sweeteners, baking powder, amaranth. Assume that calcium and sodium lactylate are permitted at level of 4000mg/kg in biscuits, cakes and pastries.</p> <p><u>Flour confectionery New Zealand:</u> Aluminium , amaranth, beta carotene, beta apo-8'- carotenol, brilliant black BN, carmoisine, chlorophyllin copper complex, potassium and sodium salts, erythrosine, gold, grape skin extracts, hydrated iron oxide, silver , turmeric, xanthophylls</p> <p><u>Food conditioners:</u> Emulsifiers and anti -foaming agents: acetylated monoglycerides, dimethylpolysiloxane, propylene glycol monoesters and diesters, phosphoric acid and its sodium potassium and calcium monobasic.. dibasic and tribasic salts.</p> <p>Sodium and potassium pyrophosphates (tetrasodium and tetrapotassium diphosphates) and sodium and potassium acid pyrophosphate (disodium and dipotassium dihydrogen diphosphates)</p> <p>Sodium and potassium tripolyphosphate, sodium polyphosphates, glassy (sodium hexametaphosphate), glycerylmonostearate.</p> <p><u>Stabilisers, thickeners, modified starches and gelling agents:</u></p> <p>Casein and its sodium, calcium and potassium compounds, modified starches, gelatin, powdered cellulose, methyl ethyl cellulose, sodium carboxymethicellulose, microcrystalline cellulose, hydroxypropyl cellulose, methylcellulose</p> <p><u>Acidity regulator</u></p> <p>Adipic acid, phosphoric acid and its sodium potassium and calcium monobasic, dibasic and tribasic salts, azodicarbonamide.</p> <p><u>Antioxidants</u></p> <p>Propyl gallate, dodecyl gallate, octyl gallate, butylated hydroxy anisole, butylated hydroxy toluene, ascorbyl palmitate and ascorbyl stearate, natural/ synthetic tocopherols, isopropyl citrate mixture, monoglyceride citrate and phosphoric acid</p>
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	<p>BRI Australia Ltd</p> <p>Bakels, NZ</p> <p>continued...</p>	<p>Also request the following alterations:</p> <p>No levels should be specified for emulsifiers, depend on GMP, as they are self-limiting.</p> <p>Yeast leavened crumpets and muffins propionic acid and its Ca, Na, K salt level to 4000 ppm, as per current NZ regulations.</p> <p>6.1 Cereals (whole grains)</p> <p>6.2 Flours, starches and meals.</p> <p>6.3 Annatto, sunset yellow, brilliant black BN, amaranth</p> <p>Schedule 4 colours to be limited to 290 mg/kg not GMP</p> <p>Category 0 General Provisions should include baking compounds and include sodium aluminium sulphate</p> <p>1.7 Include annatto and amaranth as colours</p> <p>Is there a standard for self raising flour, are aerators additives ?</p> <p>are meat pies and meat and vegetable (Standard C4) now regarded as mixed foods?</p>
26	Ministry of Health, NZ	<p>Provided data previously on tartrazine, erythrosine and aspartame - concerns over recent experimental discoveries.</p> <p>Include cyclamates, thaumatin, and saccharin in discussion p6.</p> <p>Food additive requires definition perhaps according to Codex?</p> <p>Proposed provision on carryover is a very truncated version New Zealand Food regulations and the Codex General Standard on Food additives. It omits essential features of both the Codex and New Zealand provisions.</p> <p>Industry is in the best position to develop the detail of the proposed uses within the framework established by the policy document 'The regulation of Food additives' and the provisions of the draft standard.</p>
27	Griffin's Foods Ltd,NZ	<p>P6 of proposal (0160b) Annatto extracts 25 mg/kg</p> <p>Submission suggests this as too low. That this is a disadvantage for the company. Recommend annatto colour to be included in schedule 3 and 4</p>

28	New Zealand Association of Bakers Inc.	<p>Support BRI</p> <p>Supports the addition of additives in schedule 2 on the basis of GMP</p> <p>Different interpretations of processing aids and foods in the Australian standard and New Zealand regulations have resulted in difficulties to members. To overcome this it is suggested that future drafts include some form of annotation to identify where ingredients are given different classification</p> <p>Proposed identification of bread and bread products with the permitted use of additives by food types will result in all bread made in New Zealand classified as special bread. Can be overcome by allowing the use of additives in schedule 2 in plain bread.</p> <p>Request inclusion of colours (especially caramel) .in special bread</p> <p>Request inclusion of sodium and calcium lactylates at 4000mg/kg. Current NZ regulations permit at GMP levels.</p>
29	Association of Manufacturers of Fermentation Enzyme Products (AMFEP), Brussels	<p>Comment it is unfortunate that p12 indent b, describes processing aids with the word additive.</p> <p>Suggest inclusion of definitions of food additives and processing aids in part 1; and refer in part 3 to a standard of processing aids eg Aust std A16</p> <p>Schedule 1, point 1.6.0.1 'protein coagulation enzymes used in cheese manufacturing' are processing aids.</p> <p>If they are to be listed as additives permitted preservatives should be included in schedules point 0.1, preparation of food additives</p> <p>Agree that proteases may be used as meat tenderisers in fresh meat and as stabilisers in bottled beer to prevent protein precipitation. These are technological functions. Do not agree that lipases and proteases are flavour enhancers and request that they are deleted from the additive list.</p>
30	Australasian Soft Drink Association Ltd (ASDA), NSW	<p>Increase permitted level of Amaranth to 70 mg/L (schedule 1, clause 14.1.3)</p> <p>Request Carbon dioxide to be included in schedule 2</p> <p>Omissions:</p> <p><u>14.1.2.2 Fruit & Vegetable Juice Products</u></p> <p>DSS, SAIB, glucose oxidase, EDTA (carbonated only), artificial sweetners and preservatives (incl. dimethyl dicarbonate)</p> <p><u>14.1.3 Water based flavoured drinks</u></p> <p>dimethyl dicarbonate; glucose oxidase; EDTA (fruit flavourings and fruit juice); bitter, tonic and quinine drinks can contain quinine and gentian</p> <p><u>14.1.3.3 Cordials, syrups and other soft drink bases</u></p> <p>Does this include toppings?</p> <p><u>14.3 Mixed alcoholic drinks not elsewhere standardised</u></p> <p>artificial sweetners, amaranth colour</p>

31	Food Industry Council of Australia (FICA)	Express objection of not being included in consultation
32	Australian Glutamate Information Service (AGIS)	General: support harmonisation with EU and Codex Alimentarius Commission.
33	Nestle Australia Ltd	<p>Suggest that P150 should state that permitted processing aids are treated elsewhere in the Food Standards Code.</p> <p>Provisions for miscellaneous foods in standards A10 to be continued.</p> <p>Food additive provisions consistent with Codex to be adopted.</p> <p>The proposal should be adopted by both Australia and New Zealand to proceed.</p> <p>The following have been omitted</p> <p><u>Ice cream and edible ices:</u></p> <p>Turmeric, xanthophyll, amaranth</p> <p>Is the maximum limit of 20 mg/kg for annatto extracts appropriate?</p> <p>Ice confection and ice confection mix not treated separately. Ice confections are not permitted preservatives, but benzoic acid and sorbic acid allowed in ice confection mixes.</p> <p><u>Confectionery</u></p> <p>Amaranth omitted</p> <p><u>Dairy Products</u></p> <p>For many products additives in schedule 2.,3, & 4 not added. Can currently permissible processing aids listed in these schedules be used as processing aids?</p> <p>Following omitted from standard:</p> <p><u>Condensed milk and similar products</u></p> <p>Carageenan</p> <p><u>Cream, reduced cream and light cream</u></p> <p>Calcium chloride</p> <p>Acidity regulators, stabilisers and thickeners (sodium phosphate, sodium alginates and carageenan)</p>

34	NZ Juice association	<p>Suggest that the use of artificial sweeteners to fruit juices not be permitted</p> <p>Proposed maximum limit for preservative addition to fruit juices acceptable, but the following forms of the preservatives should be specified: benzoic acid, sorbic acid, sulphur dioxide. Request the inclusion of dimethyl dicarbonate.</p> <p>Addition of acidity regulators be permitted providing the addition is declared.</p> <p>The addition of vitamins C & A to fruit juices be permitted.</p> <p>The addition of CO₂ to fruit juices be permitted.</p>
35	Hawkins Watts Ltd, Auckland, NZ	<p>Polyglycerol poly ricinoleate emulsifiers (PGPR) or E476</p> <p>Request the following to be permitted</p> <p><u>Chocolate, chocolate paste, drinking chocolate, confectionery chocolate, chocolate coating or chocolate powder, milk chocolate, white chocolate</u></p> <p>Not more than 4g/kg of polyglycerol ester of interesterified ricinoleic acid.</p> <p><u>Chocolate or milk chocolate or white chocolate where used in Easter eggs, seasonal novelties or other hollow moulded preparation, compounded chocolate or fat based confectionery</u></p> <p>Not more than 5g/kg of polyglycerol ester of interesterified ricinoleic acid.</p>
36	Devro Teepak, Aus	<p>Additives in schedule 4: Annatto extracts, Brilliant black, Sunset yellow : confirm that the maximum level permitted in edible food casing (collagen) is calculated in relation to meat encased in edible casing, otherwise maximum levels inadequate compared to current levels.</p> <p>Annatto levels in meat product casing currently contribute 20-100 mg/kg of meat product, therefore request annatto levels to 100 mg/kg in meat products encased in edible collagen casing.</p>

37	Heinz-Wattie, N.Z	<p>General: too prescriptive; food additive needs to be defined; should include flavours - not complete without; food type category needs to be more clearly defined; need to categorise colours and flavours as natural, nature-identical, artificial etc.; format often inconsistent.</p> <p>Modified cream products can have schedule 2 additives, while clotted cream can have 2 &3.</p> <p>How does attachment 2 relate to rest of document?</p> <p>Replace statements like 'fully preserved fish including canned fish product' 'commercially sterile fruits and vegetables in hermetically sealed containers' with shelf stable products packaged in cans, retort pouches, flexible or rigid plastic containers, glass jars etc'</p> <p>Canned meats omitted from standard</p> <p>Is mayonnaise and (?salad dressing) to be classified under mixed foods to allow addition of acetic acid.</p> <p>Difference between fruit and vegetable juices and fruit and vegetable juice products to be defined as permitted additives differ.</p> <p>Other foods that require classification clarification are:</p> <p>Mint flavored peas,(?processed fruits and vegetables) custards, (?dairy product) onion dip (?oil emulsion), cooking sauces(? mixed food).</p> <p>Requests permission to use acid (citric and ascorbic) in tomato juice to lower pH..</p> <p>If turmeric is defined as colour using it as a spice may be illegal?</p>
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	<p>Heinz-Wattie, N.Z</p> <p>continued...</p>	<p>Clause 4.3.3.3 Permits stannous chloride at 25 mg/kg in asparagus, this allows precipitation of rutin, Request permission to increase level to 100 mg/kg as per NZ standard.</p> <p>NZ regulations allow salt, spices, permitted flavorings and permitted carbohydrate sweetener in frozen fruit and vegetables (eg mint peas, stir fry)</p> <p>Clarification required for hash browns, frenchfries(flavouring,sugar,emulsifier,salt,pepper), battered potatowedges (flour, colours,spices), fun fries (requires colouring)</p> <p><u>Dried fruits and vegetabe</u></p> <p>Current New Zealand regulations allowing additives extensive and company requires to follow these regulations. Carbohydrate sweeteners and flavours allowed.</p> <p>Sodium carbonate and sodium citrate used as processing aids. Should they be declared as additives.</p> <p><u>Food type section 13 (for particular nutrition uses)</u></p> <p>Requires colourings in supplementary foods eg chocolate colour in chocolate flavored products</p> <p>Category 13 to be referenced to 'R' standard. Required if proposed P93 for Infant Formulae put in place.</p> <p>The following omitted</p> <p><u>Mixed Food-Liquid</u></p> <p>Isopropyl alcohol, calcium chloride</p> <p><u>Jams and spreads</u></p> <p>Sodium citrate, sorbic acid, potassium sorbate, calcium citrate, strawbeery red colour (218793), raspberry colour(217194).</p> <p><u>Sauces PCU (20.2 Mixed Food Liquid)</u></p> <p>Sorbic acid</p> <p>Annatto : levels permitted too low</p> <p><u>Custards and Creamed Rice</u></p> <p>Sodium hexametaphosphate, glycerol monostearate.</p> <p>ABOVE PERMITTED BY NZ REGS</p> <p>Annatto levels are higher than permitted in new std in custards and creamed rice in some instances</p> <p>Additives/Processing aids to be defined</p>
38	<p>European Food Emulsifiers Manufacturers Association (E.F.E.M.A)</p>	<p>Has sent the General Standard For Food Additives Prepared for CODEX. Strongly support global harmonisation of Food Additive legislation.</p>

39	Quest International, U.K;	<p>Following low dietary intake flavoring omitted Ascorbyl palmitate, ascorbyl stearate, tocopherols concentrate mixed, tocopherols d-alpha concentrate., synthetic gamma tocopherol, synthetic delta tocopherol, sulphuric acid, sodium hydroxide, potassium hydroxide, ammonium hydroxide, magnesium hydroxide, phosphoric acid, triphosphates, succinic acid, polysorbate 20, polysorbate 40, sucrose acetate isobutrate, glycerol esters of wood rosin, sucro glycerides, propylene glycol esters of fatty acids, sorbitan monooleate, sorbitan monopalmitate, guanylic acid, dipotassium guanylate, calcium guanylate, inosinic acid, dipotassium inosinate, calcium inosinate, calcium 5' ribonucleotides, dimethyl polysiloxane, candellilla wax, acetylsulphame potassium, aspartame, neohesperidine DC, quillaia extract, triethyl citrate, ethyl p hydroxybenzoate, sodium ethyl p hydroxybenzoate, propyl p- hydroxybenzoate, sodium propyl p-hydroxybenzoate, methyl p- hydroxybenzoate, benzyl alcohol, tributyrin, beta cyclodextrine, diethyl tartrate, glycerol mono/di acetate, glycerol tripropionate, isopropyl alcohol, deodorised dammar gum, isopropyl myristate, deodorised benzoin gum, deodorised elemi resin, ethyl lactate.</p> <p><u>Cocoa and Chocolate</u></p> <p>E 476 - polyglycerol esters of interesterified ricinoleic acid necessary for production of chocolate couverture.</p> <p><u>Biscuits, cakes and Pastries</u></p> <p>E 477 5g/kg for bakery wares 10g/kg for fat emulsion</p> <p>Are crisps, nuts and extruded savoury products mixed foods, solid?</p> <p>Schedule 3 Lycopene omitted</p> <p>Breakfast cereals and snacks: Annatto omitted</p> <p>Support NATCOL.</p>
40	Aplin & Barrett Ltd, England	Company manufactures preservative nisin approved for use under stds B3, H9 and P1. Would like approval for use in salad dressing
41	Gulf-Practice Industries Ltd.NZ.	Requests inclusion of crocin extracted from Gardenia as food colouring.

42	Flavour and Fragrance Association of Australia and New Zealand, NSW, AUS	<p>Schedule 1 section on the food additive preparations not as complete as provided by Standard A6, or A5 or NZ code 256A. Present food standard also incomplete. Also carriers and antioxidants not listed preservative limits are higher in NZ code and A6.' Distinction between culinary essences, extracts and flavourings' and 'flavorings' is not apparent. On pge 4 stated that flavorings in A6 will be dealt with separately . This is confusing. Schedule 1 section on prepn of food additives is unsatisfactory.</p> <p>All functions of food additives not listed eg carrier subclass diluent, carrier solvent</p> <p>Omission of antifoaming agent.</p> <p><u>Non sugar sweeteners</u></p> <p>Listing for maltol and ethyl maltol redundant if flavourings allowed</p> <p>Natural and nature identical flavourings in reconstituted fruit juice is missing</p> <p>Basis for annatto restrictions to be made clear (bixin, norbixin or other...)</p> <p>NZ regulations allow 100ppm of aspartame.</p> <p>Food categorisation according to the Draft Australia New Zealand Food Identification System should assist with food additives.</p> <p>Provision required for the addition of one or more additives to a single food.</p> <p>Best if all additives are listed alphabetically using prescribed names in Schedule 2.</p> <p>Currently approved additives missing from attachment2.</p> <p>Attachment 2 does not appear to have legal status.</p>
43	International Flavours and Fragrances (IFF) Australia	<p>Request clarification of Annatto extracts as colouring in snack foods</p> <p>Annatto extract 25mg bixin or norbixine/kg</p>

44	BOC Gases, Australia	<p>Submission of application for inclusion of acetic acid at GMP levels in following foods:</p> <p><u>4. Fruit and vege.</u></p> <p>4.1 Fresh fruits and veges</p> <p>4.1.1 Untreated fruits and veges</p> <p>4.1.3 Peeled &/or cut fruits and veges</p> <p>4.2 Frozen fruits and veges</p> <p><u>6. Cereals and Cereal Products</u></p> <p>6.1 Cereals (whole grains and meals)</p> <p><u>7. Breads and Bakery Products</u></p> <p>7.1.1 Plain Breads</p> <p><u>8. Meat and Meat Products (incl. poultry and game)</u></p> <p>8.1 Fresh meat, poultry and game</p> <p>8.1.1 Fresh meat, poultry and game in whole cuts</p> <p>8.1.2 Fresh comminuted meat, poultry and game</p> <p><u>9. Fish and Fish Products</u></p> <p>9.1 Fresh fish and fillets (inc. frozen and thawed)</p> <p>9.1.1 Finfish (frozen)</p> <p>9.1.2 Crustacea, molluscs, echinoderma (uncooked)</p> <p><u>12. Salt, Herbs, Spices, Condiments</u></p> <p>12.2 Herbs, spices, condiments</p>
45	<p>Australian Associated Brewers Inc (AAB).</p> <p>Australian Associated Brewers Inc and New Zealand Brewers.</p>	<p>General: support P150 - great improvement; support general list of permitted additives.</p> <p>Suggest inclusion of following additives in beer only: ascorbic acid and sodium, calcium and potassium ascorbates (300-303); caramel; erythorbic acid (315), sodium erythorbate (316); nisin (234); nitrogen (941); propylene glycol alginate (405); and sulphites. Suggestion made on premise of preserving and enhancing natural image of beer.</p> <p>Suggest inclusion of caramel flavours I to IV. Justification: used in EU</p> <p>Prefer a positive list of additives in place of the proposed miscellaneous list in Sch 2 of the draft std.</p> <p>Issue of flavorings is to be discussed by both Aus & NZ and brewers. Both indicate support for natural fruit flavours or vegetable extracts in beer (to be reviewed by commodity stds regulating beer).</p>

46	New Zealand Dairy Board	<p>Requests to include NZ food regs , AUs food stds code and draft codex requirements</p> <p>General: support P150; support grouping of additives on known toxicological data; support development of food categorisation system to identify food groups.</p> <p>Suggest that clear definitions of maximum permitted levels needed.</p> <p>Specific concerns not identified in P150: how much milk is needed in a liquid milk-based drink; what exactly is a rennet preparation; what is the compositional criteria for dairy based dips and how much milk product is needed to use the name?</p> <p>Acknowledged that all flavorings are not covered, but nutrients, antifoaming agents, enzymes, carriers and solvents require acknowledgement for absence.</p> <p><u>Supports retaining the following provisions that are omitted:</u></p> <p>Dried milk, milk fat and water with or without dried buttermilk may contain modifying agents in group IV std A10.</p> <p>Skim milk, non fat milk, reduced milk : carrageenan permitted when calcium salts added for mineral fortification.</p> <p>Fermented milk: Agar-agar, carrageenan, guar gum, carob bean gum, cellulose gum, xanthan gum, gellan gum, pectins, modified starches, lactitol, xylitol, sorbitol and syrup, manitol and syrup. (Codex draft step 3 permits this)</p> <p>Yoghurt, skim milk yoghurt modifying agents in groups I and VI in A10 to not more than total 10g/kg.</p> <p>Cultured milk and fermented milks in NZ are allowed citric acid and sodium salts as acid regulators, stabiliser and thickener specified in reg253 (2)b of NZ regs.</p> <p>Annatto colour to be increased to 60mg/kg in yoghurt drinks to keep in touch with current practice (No current NZ limits).</p> <p>Rennet preparations to contain upto 1500 ppm benzoic acid / sorbic acid. Rennet upto 9000 ppm benzoic acid/benzoic acid. Both allowed flavorings and colourings.</p> <p><u>Refer revised Codex condensed milk standard</u></p> <table border="1"> <thead> <tr> <th>INS Number</th> <th>NAME</th> <th>LEVEL</th> </tr> </thead> <tbody> <tr> <td>951</td> <td>Aspartame</td> <td>1000mg/kg</td> </tr> <tr> <td>507</td> <td>NaCl</td> <td>)</td> </tr> <tr> <td>508</td> <td>KCl</td> <td>) 2g/kg singly</td> </tr> <tr> <td>509</td> <td>CaCl₂</td> <td>) or 3g /Kg</td> </tr> <tr> <td>331</td> <td>Na citrate</td> <td>) in combin-</td> </tr> <tr> <td>332</td> <td>K citrate</td> <td>) ation,</td> </tr> <tr> <td>332</td> <td>Ca citrate (anhydrous)</td> <td></td> </tr> <tr> <td>500</td> <td>Na carbonate</td> <td></td> </tr> <tr> <td>501</td> <td>K carbonate</td> <td></td> </tr> <tr> <td>170</td> <td>Ca carbonate</td> <td></td> </tr> </tbody> </table>	INS Number	NAME	LEVEL	951	Aspartame	1000mg/kg	507	NaCl)	508	KCl) 2g/kg singly	509	CaCl ₂) or 3g /Kg	331	Na citrate) in combin-	332	K citrate) ation,	332	Ca citrate (anhydrous)		500	Na carbonate		501	K carbonate		170	Ca carbonate	
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	<p>New Zealand Dairy Board</p> <p>continued....</p>	<p>339 Na phosphate</p> <p>340 K phosphate</p> <p>341 Ca phosphat</p> <p>407 Carrageenan 150mg/kg</p> <p><u>Revised Codex Evaporated milks stds</u></p> <p>As above but add sodium polyphosphahte potassium polyphosphate calcium polyphosphahte cf previous Australian Std H3, (100 mg/kg carrageenan to evaporated milk) and NZ regs 108/107 which allows 0.2% singly or 0.3% in combination of above salts. Suggest adopt schedule 2 for condensed milk and add aspartame and NaCl found in Codex.</p> <p><u>Cream, reduced cream, light cream with pasteurised scalded and UHT cream.</u></p> <p>NZ regs 101 allows acidity regs as specified in 253 (2).(c) and stabilisers or thickeners in 253 (2) (b) of the regulations similar to NZ regulations 102.</p> <p><u>Dried milk, milk powder, cream powder</u></p> <p>Polyoxyethylene (20), sorbitan monopalmitate (434), propylene lycol monoesters and diesters (477), dimethylpolysiloxane (900) and sodium stearyl lactylate (481) : NZ regs</p> <p>Ascorbyl palmitate (304) and BHA (320) magnesium oxide (530), magnesium phosphate tribasic (343) : codex dtaft std</p> <p><u>Cheese and cheese products</u></p> <p>Hexamethylene tetramine, potassium aluminium silicate (555), zinc silicate (557), potassium silicate (560) : Additives draft codex std</p> <p><u>Ripened cheese</u></p> <p>Covered by schedule 2, except for propylene glycol mono and di-esters (477) or sodium stearyl lactate (485).</p> <p><u>Processed cheese</u></p> <p>Annatto extracts and B-carotene singly or in combination to 600ppm:NZ regs</p> <p><u>Dairy based dips</u></p> <p>Allowed preservatives 500mg/kg when cheese is 3000 mg/kg. This is restrictive.</p> <p>Annato to levels 180mg/kg in current use</p> <p>Nisin in GMP levels requested</p>
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	New Zealand Dairy Board continued....	<p><u>Fats and oils and fat emulsions (essentially water free) butteroil and ghee</u></p> <p>Butylated hydroxytoluene (BHT), ascorbyl stearate: draft codex std</p> <p>Natural tocopherols, synthetic tocopherols, not more than 200ppm of : propyl, octyl and dodecyl gallates, butylated hydroxyanisole, butylated hydroxy toluene: NZ regs 112.</p> <p>If ascorbyl stearate and BHT are not permitted. Propyl, octyl and dodecyl gallates may be added upto 100mg/kg and BHA upto 200mg/kg individually.</p> <p><u>Fats and oils and fat emulsion (>50% water) butter margarine and similar products</u></p> <p>Annatto to 20mg/kg: Draft Codex</p>
47	GS Lintott & Company, NZ	EDTA (and/or its sodium and calcium salts) to be included on Mayonnaise and Salad Dressings to delay oxidative rancidity and allow colour retention. Currently represents a significant trade barrier.
48	New Zealand Dairy Foods Ltd, Auckland	<p>Flavored milks: Annatto to be increased to 20ppm, carmosine to 5ppm.</p> <p>Yoghurt preservative level should be up to 150 ppm, to allow for 1000ppm preservative in added fruit pulp.</p>
49	Confectionery Manufacturers of Australasia	<p>Include amaranth as colour in schedule 3. Justification: alternative colour would mean new composition of many products (Having just replaced erythrosine, this is expensive and unpopular).</p> <p>PGPR (476) to be included in clause 5.1 schedule1. (up to 4 or 5g/kg according to current Aust or NZ code, respectively). Emulsifier used by almost all chocolate manufacturers in Aust & NZ.</p> <p>Disagree with suggestion to include additives sorbic acid (200), sodium sorbate (201), potassium sorbate (202), calcium sorbate (203) to 5.2 Confectionery >50% sugar. Suggest that inclusion 5.3 Confectionery <50% sugar more appropriate. Justification: preservation of product more necessary due to sugar content.</p> <p>Sunset yellow and brilliant black should be included in schedule 4 to the level of 290mg/kg.</p> <p>Suggest 5.3 Confectionery <50% sugar - Bubble gum should be changed to chewing gum and bubble gum. Clause 4 part C regulates permission for BHA (0320) for bubble and chewing gums.</p> <p>Supports the inclusion of the Clause 3 explanatory note for GMP in final standard.</p>
50	European Commission	Suggest that adopt Codex General Standard for Food Additives to avoid "unnecessary problems in international trade".

51	Ministry of Commerce, New Zealand	<p>Concerned with alignment of P150 with Codex or NZ regulations - trade implications</p> <p>Supports horizontal legislative approach to additives; supports use of GMP in deciding levels of additives.</p> <p>Concerned with some additives being permitted in wine and brandy legislation and not in P150.</p>
52	Trans Asian Food Centre Pty Ltd., Australia	<p>Submission for inclusion of sodium benzoate, potassium sorbate and sodium metabisulphite in “moderate proportions” in sauces and preserved foods. Significant impact on trade within Australia and Asia.</p>
53	<p>Heyhoe & Associates, Victoria, Australia (on the behalf of Johnson & Johnson Pacific Pty Ltd)</p> <p>(on behalf of CPC International Inc.)</p>	<p>Strongly support inclusion of intense sweeteners for use in breakfast cereals (in particular extruded products re. heat stability).</p> <p>Suggest extension of use of intense sweeteners to include novel confectionery items (eg sweetened popcorn). Justification: increase complex carbohydrates and reduce potential tooth decay.</p> <p>Request more precise definitions in categorisation of cereal based products; eg. popcorn (processed cereal and meal products or confectionery?), muesli (processed cereal and meat products or mixed foods, solid?).</p> <p>Identify differences between current Standard A8 Artificial Sweetening Substances and P150 with regards to 11.4 Non-sugar sweeteners - eg. magnesium stearate, calcium and sodium salts all listed previously, and are approved for use in icing and icing mixtures at not more than 1.5g/kg calculated as the acid. It is suggested that the following be included in schedule 2: “stearic acid and calcium, magnesium and sodium stearates”. (Unless stearic acid and its salts are processing aids?)</p> <p>re. use of calcium disodium EDTA in mayonnaise at 75mg/kg (as permitted in USA since 1964). Have previously submitted application for inclusion in food code, however due to costs did not pursue application. Now requesting further consideration. EDTA used extensively world-wide, currently used in Aust. in flavourings, soft drink flavourings, fruit flavourings, fruit juice, fruit pulp or orange peel extract, and carbonated fruit drinks. Request inclusion for 2.2.1 fat emulsions (assuming that this covers mayonnaise), and 20.2 mixed foods, liquid - mayonnaise and salad dressings not elsewhere standardised.</p> <p>Suggest that if mayonnaise is included in 2.2.1, a separate line entry of “mayonnaise” may be appropriate.</p>

54	Distilled Spirits Council of the United States	<p>Suggest that P150 adopt Codex Alimentarius list of food additives and colours to facilitate international trade.</p> <p>Suggest that all additives that are permitted in foods also be permitted in distilled spirits (which is also a food?).</p> <p>Additives to be included in 14.2.5 spirits and liquors: tannins, sorbic acid, potassium sorbate, benzoic acid, sodium benzoate, sulphur dioxide, sodium metabisulphite, ascorbyl palmitate, tertiary butylhydroquinone, butylated hydroxyanisole, butylated hydroxytoluene, gold, lecithin, maltol, ethyl maltol, sucrose acetate isobutyrate, glycerol esters of wood rosin, brominated vegetable oil, ethyl vanillin, acetic and fatty acid ester of glycerol, lactic acid and fatty acid esters of glycerol, citric and fatty acid esters of glycerol, polyglycerol esters of interesterified ricinoleic acids, polydimethylsiloxane, cupric sulphate, ammoniated glycyrrhiza, caffeine, cyclodextrins, ethylenediaminetetraacetic acid, glycyrrhizin extract, glycyrrhizin, quillia extract, yucca extract, sodium carboxymethyl cellulose, silver, and vanillin. Suggest GMP levels.</p> <p>Suggest food additives be permitted for all distilled spirits products irrespective of their alcohol content (ref. 14.2.5 defined by alcohol content 37% or above alcohol by volume vs. 14.3 of >37%. "The distinction made...is an artificial barrier that serves no discernible public interest".</p> <p>Suggestion that regarding additives to a distinctive product of a particular country, the laws and regulations of the country of production should govern. Eg. Bourbon whisky and Tennessee whisky are recognised internationally, and hence laws and regulations of the US concerning additives should "be preemptive or any food additive standard that attempted to permit otherwise".</p>
55	Axiome Pty, Ltd. Australia	<p>re. use of calcium disodium EDTA in mayonnaise at 75mg/kg (as permitted in USA since 1964). Have previously submitted application for inclusion in food code, however due to costs did not pursue application. Now requesting further consideration. EDTA used extensively world-wide, currently used in Aust. in flavourings, soft drink flavourings, fruit flavourings, fruit juice, fruit pulp or orange peel extract, and carbonated fruit drinks. Request inclusion for 2.2.1 fat emulsions (assuming that this covers mayonnaise), and 20.2 mixed foods, liquid - mayonnaise and salad dressings not elsewhere standardised.</p> <p>Suggest that if mayonnaise is included in 2.2.1, a separate line entry of "mayonnaise" may be appropriate.</p>

56	Australian Food Industry Science Centre (AFISC), Victoria	<p>Comment that edible coatings permitted in schedule 2 will not be permitted in fresh fruits and vegetables/or surface treated fruits and vegetables / peeled/cut fruit and vegetables (4.1.1 & 4.1.2). This should be permitted to levels determined by GMP.</p> <p>4.1.3 to be renamed Minimally processed fruits and vegetables (according to application 319)</p> <p>Also include applications:</p> <p>edible coatings in 252 peeled potatoes</p> <p>302 cheese and cheese products</p> <p>319 minimally processed fruits and vegetables.</p>
57	Australian Food Council	Extensive comments and suggestions - See Attachment
58	Foodsense Australia	<p>Isomalt recorded in attachment 2 as anticaking agent, humectant and glazing agent; Codex gen requirements vol1A p84 describes it as bulking agent, sugar replacer/bulk sweetener.</p> <p>All listings to be reviewed in comparison with codex requirements.</p> <p>Section 13.3 and 13.4 not appropriate for R2 Low Joule Foods or R#3Carbohydrate Modified Foods. Need new section in 13 for Low Joule Section and Carbohydrate Modified Section.</p> <p>Schedule 2 to contain artificial sweeteners 0950, 0956, 0952,0954.</p>
59	Distilled Spirits Industry Council ,AUS	<p>Status Quo for beer P1 (cat 14.2.1) and P2 Fruit wines be maintained. New permission to use flavourings of concern. These are allowed for new products in Std P5, where they must be labelled appropriately (with designation and ingredients).</p> <p>Fruit wines P2 must be treated consistently with grape wines Std P4 (restricted additive list)</p> <p>Additives permitted in scotch whisky to be limited (Std P3 Clause 5ea (v))</p> <p>E 174 (silver) E175 (gold) to be allowed in liquers.</p>
60	Two Dogs, Australia	Concerned about changes to P2/5
61	A C Hatrick Chemicals Pty Ltd, Australia	Suggest inclusion of hydroxypropylcellulose, methycellulose, carboxymethylcellulose, hydroxypropylmethylcellulose

62	Safe food campaign, NZ	<p>1. That heavy restrictions are immediately placed on two food colourants erythrosine and tartrazine</p> <p>2. That the government immediately place the same restrictions as the European Union has on Amaranth and Annatto.</p> <p>3. That the government set maximum quantitative limits for any other artificial additives used in food and these be based on a safety factor of at least 1000.</p> <p>4. That an immediate review be undertaken of the food colorants listed in Appendix 1 and their adverse health effects and that this is open to the public.</p> <p>5. That pending the outcome of the review all food products with artificial colourants in them contain a disclaimer on their consumer information panel which warns consumers that food colourants may trigger allergic reactions in sensitive people.</p> <p>Summary of 15 harmful colour additives, which are banned in countries, side effects and countries they are banned are given</p> <p>Tartrazine (active pesticide ingredient); Sunset yellow ,110; Cochineal 120; Azorubine 122; Amaranth 123; Ponceau 4R 124; Erythrosine 127; Allura red 129; Indigo carmine 132; Brilliant blue 133; Green S 142; Caramels 150; Brilliant black PN 151; Brown HT 155; Annatto extracts 160b</p> <p>(They attach a table of summary of side effects and restricted countries for above)</p>
63	Melrose Laboratories Pty Ltd, Australia	Ascorbic acid to apple cider vinegar
64	Castle Coatings , NSW	<p>Additives listed under US regulations , Title 21 section 172.210 -coatings on fresh fruit</p> <p>1. Pentaerythritol ester of maleic anhydride</p> <p>2. Polyethylene glycol</p> <p>3. Sodium lauryl sulphate</p> <p>4. Glycerol esters of wood rosin</p> <p>to be considered in the review.</p>
65	Pillsbury ,Australia	Nisin in chilled pasta sauces (cream based) to the level of 500mg/kg.