

# Australian Food and Grocery Council SUBMISSION

SEPTEMBER, 2012

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND

**IN RESPONSE TO:**

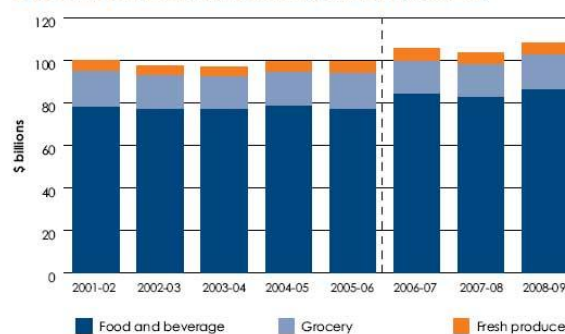
A1043 - WHO LIMITS FOR PACKAGED WATER

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover of \$108 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. The industry is similar in size to the mining sector.

Figure 4.1: Composition of the industry's turnover (\$2008-09)



Source: ABS, catalogue number 8221.0 and 8159.0

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest and most important manufacturing industry. Representing 26 per cent of total manufacturing turnover, the sector is the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

This growing and sustainable industry is made up of over 30,100 businesses and accounts for \$46 billion of the nation's international trade. The industry spends \$368 million a year on research and development.

The food and grocery manufacturing sector employs more than 312,000 Australians, representing about 3 per cent of all employed people in Australia, paying around \$13 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>2</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

<sup>2</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

## 1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the assessment report for Application A1043 - *World Health Organization Limits for Packaged Water*.

AFGC notes the intent of this application is to amend Standard 2.6.2 – Non-alcoholic Beverages and Brewed Soft Drinks, in the Australia New Zealand Food Standards Code (the Code), to adopt limits for certain chemical substances in packaged water to reflect limits in the international standard established by the World Health Organization (WHO).

The AFGC supports this application on the basis that this is intended to ensure the protection of public health and safety through independent international experts, the World Health Organisation (WHO); and that adopting levels set by WHO facilitates international trade.

AFGC does not support the assessment by FSANZ that the WHO level for styrene should be rejected in favour of a higher level permitted for processing aids. Instead, AFGC suggests that FSANZ consider allowing packaged water to have a lower level consistent with the WHO guidelines of 0.02mg/L.

AFGC accepts that FSANZ dietary modelling may indicate a need to reduce the level of fluoride.

### **Recommendation:**

**That FSANZ prepare a draft variation to the Code to remove the existing Table to subclause 2(2) in Standard 2.6.2 to include a reference to the WHO guidelines, with the exception of fluoride.**

## 2. GENERAL COMMENT ON APPLICATION

AFGC believes that an internationally competitive domestic food and grocery manufacturing industry supported by a robust and responsive policy and regulatory framework is critical to ensuring our food supply is secure, that it meets the nutrition and health needs of consumers and it is sustainable for the longer term. This application is intended to reduce the regulatory burden on industry, providing a more competitive and innovative market in responding to consumer need, and thereby provide an opportunity for improved public health and a reduction in the burden of disease on the community.

Furthermore, citing the World Health Organisation, an international authority, as distinct to the National Health and Medical Research Council Australian Drinking Water Guidelines, will help with eliminating inconsistencies between Australia and New Zealand and avoid the need for different standards for each country. This not only facilitates trade, but reduces the burden on border control and inspection and increases consumer confidence.

AFGC supports the principles on which FSANZ determines that Option 2 supports the primary objective of protecting public health and safety on the basis that:

- The WHO guidelines have been developed by experts to produce a contemporary and extensive list of chemical substances and their respective limits for use with drinking water;
- The guidelines are based on a scientifically justifiable risk assessment;

- The guidelines provide the basis for the Australian Drinking Water Guidelines, Drinking Water Standards New Zealand and the CODEX *Standard for Bottled/Packaged Drinking Waters (other than natural mineral waters)* (CODEX STAN 227-2001); and
- The limit for fluoride as an exception to the WHO guidelines is justified from a regional (Australian and New Zealand) perspective and supported by dietary intake data and exposure assessment.

AFGC supports the conclusion that adopting this option would enhance the safety of packaged water compared to the current chemical specifications in Standard 2.6.2 of the Code.

However, AFGC does not support the rational for increasing the level of permissible styrene above that recommended by WHO of 0.02 mg/L on the basis that it was approved for use as a processing aid. Ground water or water sourced from a reticulated water supply would not normally contain elevated levels of styrene and there can be no justification for allowing a higher levels to permit the potential for contamination. Styrene is an environmental contaminant and low doses have been reported in drinking water (usually 0.1–0.2 µg/l) and in some foods such as beer and coffee (10–350 µg/kg).

Packaging materials used for packaged water tend not to use styrene, but rather use glass, PET, or polycarbonate. It is highly unlikely that there is any migration of styrene monomers from these packaging materials to packaged water, and therefore no provision for increased levels of styrene from packaging is required.

In addition to which, studies have identified there are significant taint and odour problems which diminish the acceptability and use of foods and beverages. Thresholds for styrene monomer detection in water is report as very low (taste threshold: 0.022 – 0.37mg/kg)<sup>3</sup>. This makes the proposed level of 0.03 mg/L unacceptably high and likely to result in consumer complaints and product recalls.

AFGC recommends that consideration be given to allowing packaged water to have a lower level consistent with the WHO guidelines, and in the event that FSANZ perceive a regulatory conflict with the permission for the processing aid, that consideration be given to lowering the level permitted for the processing aid consistent with the WHO level. This will ensure a higher degree of certainty for industry and consumers that the levels ensure both the safety and suitability are being adhered to internationally, and that there will be no risk to disruption of trade if Australia permits a higher level of contaminant in product.

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<sup>3</sup> *Advances in Food and Nutrition Research: Volume 56; Volume 2009, page 35*

# Australian Food and Grocery Council

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- Grant Thornton
- GS1 Australia Ltd
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- King & Wood Mallesons
- KPMG
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- Monsanto Australia Ltd
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