



THE NEW ZEALAND

ICE CREAM

MANUFACTURERS' ASSOCIATION (INC.)

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Submission on

Draft Variation to the Australia New Zealand Food Standards Code (Volume 1, Chapters 1-5) – Proposal P1025

Code Revision

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Association (Inc)**

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Date: **26 September 2013**



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The New Zealand Ice Cream Manufacturers' Association would like clarity on the intent of the draft variation as to whether named foods in quotes, can be qualified. This submission is in relation to Low Fat "ice cream".

Low Fat "ice cream" is now clearly recognised within the Australia and New Zealand market as being a dairy product and must be 3% or below total fat with a minimum solids of 168g/L.

The New Zealand Ice Cream Manufacturers' Association interpretation of the draft variation of the Code Revision is :

- Low Fat "ice cream" is now more clearly defined in the Compositional requirement for Ice Cream S2.37, with the additional statement "consists of ice cream" S2.37(1a)
- This statement "consists of ice cream" is then related to S1.23(1) which is still clear about the compositional requirements of a food sold on the basis of a representation that it is food with a "specified name" or of a specified nature
- And S1.23(2) Use of a specified name infers that the specified name can be qualified. Therefore, our understanding is that Low Fat "ice cream" is permitted under this section.

The New Zealand Ice Cream Manufacturers' Association believes that S1.23 (1) "of a specified nature" and S1.23(2) "Use of a specified name" are not clear and should be more adequately defined, to avoid other products being sold as "misrepresentations" of "ice cream", such as those with a soy or coconut base and other ingredients.

The New Zealand Ice Cream Manufacturers' Association strongly endorses S2.37 the compositional requirement for "ice cream", and requests that a clause is inserted in the Code to allow qualification for the specified name of "ice cream", and that the only qualification allowed to be used is "Low Fat".

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