

PUBLIC COMMENT RECEIVED**PROPOSAL P150 - JOINT GENERAL STANDARD FOR FOOD ADDITIVES**

SUBMITTER	COMMENTS	ACTION TAKEN
Allergy, Sensitivity and Environmental Health Association Qld (ASEHA)	<ul style="list-style-type: none"> - does not support proposal - suggests that risk assessment studies should be improved - suggests more research is required - suggests a reduction in the number of food additives - does not support international harmonisation - suggests more consultation and financial support of consumer groups necessary - suggests that a complaints mechanism be developed - suggests that an adverse reaction register be established - suggests that the following food additives be banned: 102, 107, 110, 122-129, 133, 142, 151, 155, 160b, 200-203, 210-213, 220-228, 249-252, 280-283, 310-321, 621 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150

Australasian Soft Drink Association	<ul style="list-style-type: none"> - suggests permissions for intense sweeteners inconsistent - suggests paragraphs be indented to allow easier reading - request iron salts be permitted in mineralised water - require definitions for fruit and vegetable juices - request provision for nitrogen as pressurising agent in fruit juices - “not containing concentrate only” needs to be clarified - require definition for fruit and vegetable juice products - fruit drink subheading confusing - low joule fruit and vegetable products aspartame and alitame permissions missing; Ace K level seems high - requests permission for natural colours in above category - not adequate provision for preservatives in fruit and vegetable drink products; should be same as 11.1.3 for sorbic acid, benzoic acid and sulphur dioxide - carbon dioxide needs to be permitted in 14.1.2.2 - states it is not clear that additive levels refer to cordials etc. as made up - no low joule water based flavoured drink category - no provisions for quinine and gentian for tonic drinks - cider and perry require sulphur dioxide, caramel, lactic, malic and citric acid - fruit toppings currently permitted to contain DSS and SAIB; not included in P150 - supports the Calorie Control Council's proposal regarding intense sweeteners being incorporated in schedule 2 - generally supports P150 	<p>formatting different review proposal commodity review processing aid commodity review commodity review commodity review permission given - hierarchical structure all colours permitted changes made</p> <p>permitted; schedule 2 see Clause 5 (1) low joule not specifically identified, additive permissions adequate flavourings sch 2</p> <p>changes made</p> <p>changes made</p> <p>ADI issues</p>
Australian Associated Brewers Inc.	<ul style="list-style-type: none"> - supports P150 - suggests additives in beer be quoted in mg/L or g/L - request caramel at GMP in beer (as per NZ, US, UK) - request ascorbates, erythorbates and propylene glycol alginate at GMP (as per NZFR) - suggests sulphur dioxide listing read: ‘sulphur dioxide, sodium and potassium metabisulphite and sodium and potassium sulphite’ - request permission for use of flavourings (NZ, imports) 	<p>inconsistent with rest of P150 changes made changes made</p> <p>inconsistent with rest of P150, Clause 3</p> <p>changes made</p>
Australian Chemical Trauma Alliance	<ul style="list-style-type: none"> - suggest that the use of food additives be further restricted - claim there is not enough food options available 	<p>all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150</p>

<p>Australian Dairy Products Federation Inc.</p>	<ul style="list-style-type: none"> - fully supports proposal objectives - states interpretation difficult due to a lack of definitions - requests that food identification system be included in some form - requests standardisation of terms maximum permitted limit vs. level - suggests clause 5 read “a food additive may only be added to a food where expressly permitted” - suggests formatting could be clearer - states buttermilk sold in Australia is cultured, and therefore should be in category 1.1.2 - requests definition for liquid milk based drinks - queries where ‘modified milks’ as per current AFSC are classified - request definition for recombined milks; not clear whether included in 1.1.2 - states that including expression “additives...expressly permitted below” is confusing - states it is not necessarily acceptable that yoghurts are considered modified products - queries what is modified rennetted milk - states that modified fermented milk is not clear; implies a modification of composition which is probably not the intention - queries where fruit yoghurts are to be classified - requests that condensed milk and evaporated milk be permitted diphosphates (450) and triphosphates (451) (Codex) - states the UHT additives exemption should apply to all creams that have been heat-treated at high temperatures (ultrapasteurised) - states it is inconsistent to permit all additives in UHT cream, and none in pasteurised cream; suggests only modifying agents in A10 grp II and IV - suggests BHA level of 1mg/kg is a mistake, Codex level is 100mg/kg - queries is pimaricin is only permitted on cheese surfaces - requests definition of a ‘fresh cheese’ - requests hexamethylene tetramine in provolone cheese at 25mg/kg expressed as formaldehyde (Codex) 	<p>commodity review guidelines have been prepared changes made changes made</p> <p>formatting modified buttermilk is in 1.1.2</p> <p>commodity review see guidelines commodity review; interpretation notes formatting</p> <p>as they may contain modifying agents, it is considered appropriate to classify some of them as modified products interpretation notes commodity review changes made</p> <p>mixed foods, dairy and fat based desserts, dips and snacks changes made</p> <p>changes made</p> <p>changes made yes commodity review no data provided</p>
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<p>Australian Dairy Products Federation Inc. cont.</p>	<ul style="list-style-type: none"> - requests propionic acid and salts for surface treatment of shredded and cut unripened cheeses (Codex) - suggests potassium aluminium silicate, zinc silicate and potassium silicate be permitted as anticaking agents in cheese - requests distarch glycerol, acetylated distarch glycerol and hydroxypropyl distarch glycerol be permitted - requests definition for processed cheese - queries inclusion of reformed cheese - states the level of sorbates permitted in processed cheese products is reduced from current permissions - queries additive permissions for butter; request permission for lactic acid, potassium chloride and flavours - request permission to use annatto and beta-carotene (as per Codex) - request permission for BHT and ascorbyl stearate in edible fats - queries whether ghee is a fat of named variety, and hence not permitted additives? 	<p>ADI issues</p> <p>processing aids</p> <p>processing aids</p> <p>commodity review</p> <p>changes made</p> <p>ADI issues</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>changes made</p>
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<p>Australian Food and Grocery Council (AFGC)</p>	<ul style="list-style-type: none"> - supports development of generic standard for food additives - suggests "Food additives are distinguished from processing aids..." - suggests inclusion of list of certain products that are not additives (as per Clause 5 article 1 EU Directive on Food Additives) - suggests definitions be listed in alphabetical order - other proposals call definitions section 'Interpretation' - as 'maximum permitted limit' is defined, suggests change Clauses 4, 5, 6 and headings in schedule 1 for consistency - suggests bread definition be removed; if assistance in interpretation necessary, suggest inclusion in Applications, as per 6.3 - suggests last paragraph in editorial note Clause 3 be removed, as this is a labelling issue and does not assist in application of GMP - supports clauses 5 (1) and 5 (2); suggests these clarify point - suggests clause 5 (2) read "Cyclamates and its salts....." - suggests an entry for saccharin and its salts (as per Standard A8 AFSC) - queries unity principles, as currently only applies to preservatives, antioxidants and synthetic colourings - suggests basis of unity principle flawed: "...assumes effect of an additive is directly and linearly proportional to the quantity added to a food and it ignores the possibility of minimum threshold levels or lag phases before any effect is achieved. It ignores the fact that additives having the same function often have different physical and chemical conditions for optimum effectiveness." - suggests unity principle be abandoned; the combined use of additives having same function be subject to GMP to determine relative proportions - Clause 6 "and" should be replaced with "or" - supports Clause 7; suggests "other than by direct addition" be omitted, as redundant - supports Clause 8; suggests limitation on ingredient to that permitted in final food be removed (thereby relying on limits on final food as sufficient control); or reworded so that additive not present in a quantity that would result in the final food exceeding any limits prescribed for the additive(s) 	<p>changes made to be considered for inclusion in Joint FSC</p> <p>formatting changes made</p> <p>changes made</p> <p>changes made</p> <p>changes made changes made changes made changes made</p> <p>changes made changes made</p> <p>Codex wording</p>
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AFGC cont.	<ul style="list-style-type: none"> - supports Clause 10; states wider than AFSC permission, but consistent with NZFR - suggests that further clarification of references of additives and their salts: <ul style="list-style-type: none"> sulphur dioxide to sodium and potassium sulphites and bisulphites; sorbic acid - sodium, potassium and calcium sorbates; benzoic acid - sodium, potassium and calcium benzoates; cyclamates is cyclohexylsulphamic acid and its sodium and calcium salts; nitrite - sodium, potassium nitrite - suggests by including information detailed above, schedule 1 would be simplified - suggests amaranth in fish roe and confectionery be limited to 290mg/kg - requests preparations of vitamin A be permitted 200mg/kg BHA and 70mg/kg BHT (as per AFSC); recognises that 1.3.2 may be more appropriate - suggests additives 216 and 218 be renamed methyl paraben and propyl paraben in 0.1 colours in aqueous solutions - suggests sorbic acid, potassium and calcium sorbate be permitted in colours in aqueous solutions at 1000mg/kg (more effective than benzoic; consistent with flavourings permission) - suggests that 0.1 preparations of food additives allow benzoic and sorbic acid instead of specific permissions in flavours etc. and colours - suggests that where benzoic acid permitted, sorbic acid be included eg. maraschino cherries, chilli paste - suggests that the following carriers omitted: benzyl alcohol, isopropyl alcohol, ethyl alcohol, ethyl acetate, glyceryl monoacetate, glycerol diacetate, triethyl citrate - requests that flavours be permitted EDTA or salts at 500mg/kg (AFSC) - requests clarification of cream additive permissions regarding UHT - requests that current regulations on cream, extra light cream, light cream, reduced cream, whipping cream etc. be retained - suggests that if natamycin is at GMP in fermented uncooked comminuted meats it should be permitted in cheese surfaces at same level - suggests that all nitrates (potassium and sodium salts) be calculated as sodium nitrite, as per requirements in meat products category - requests addition of BHT in fats and oils (NZFR, Codex) 	<p>consistent with AFSC, wider than NZFR</p> <p>changes made</p> <p>EU level</p> <p>carry over from oil</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>ADI issues</p> <p>processing aids</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>changes made</p>
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AFGC cont.	<ul style="list-style-type: none"> - supports the classification of citric acid, sodium citrate and sodium salts of orthophosphoric acid as processing aids in the use of blood - suggests that annatto levels in edible meat casings be based on the individual weight of the meat product, and states that no limit applies (AFSC) - suggests that mineral oil in edible casings should be considered as processing aids (in table of generally permitted processing aids) as used as a lubricant to facilitate the handling of casings - suggests that gluteral be considered a processing aid - states that current AFSC permits sorbic acid and sorbates in uncooked fermented manufactured meat and semi-dry heat treated manufactured meat, whereas P150 restricts to comminuted dried meat; states this is an error - suggests 'dried meat' be removed, sorbic acid and sorbates be permitted in processed comminuted meat, poultry and game products, and fermented uncooked processed comminuted meat products - suggests that erythorbic acid and sodium erythorbate be permitted in the same way as ascorbic acid and its salts, as they perform the same function - suggests that current liquid egg white permissions anomalous, as frozen not permitted to contain additive, and limit is same for liquid and dried product - suggest that triethyl citrate be permitted in frozen liquid egg white at 1.25g/kg, and level in dried liquid egg be prescribed on a reconstituted basis - states current standard provides for egg white mix; should be included in P150 with schedule 2 additive permissions - suggests that sorbic acid, potassium and calcium sorbates be permitted in liquid egg products at 5000mg/kg (EU) - suggests sulphur dioxide be permitted in any sugar syrup at 450mg/kg - suggests a generic provision be included in clause 5 which permits a food in concentrated or dehydrated form to contain any additive permitted in the ready to use form at a level in proportion to the degree of concentration 	<p>permitted as both processing aids and food additives changes made</p> <p>is to be considered a processing aid</p> <p>is to be considered a processing aid changes made</p> <p>changes made</p> <p>carry over permits additive</p> <p>already permitted</p> <p>need evidence of need/use from industry changes made</p>
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AFGC cont.	<ul style="list-style-type: none"> - suggests that bases for intense sweeteners can't be considered processing aids, and croscarmellose sodium glycine, L-leucine, propylene glycol need to be included in 11.4 - suggests that magnesium stearate be included in schedule 2 - suggests 1521 be removed from 11.4.2 as it is in schedule 2 - notes that cyclamates are not proposed to be permitted in tabletop sweeteners in portion sized packs and in liquid preparations; recommends that: <ul style="list-style-type: none"> a) examine to ensure will not cause unnecessary problems for Aust and NZ manufacturers and importers b) justifies decision on public health and safety grounds - suggests that table salt is listed twice, recommends omission from 12.1.2 - states that AFSC permits calcium sodium aluminosilicate in table salt, P150 proposes to permit calcium aluminium silicate; no standard for former of purity in A11, no INS in A; is this an error? - suggests sterile diatomaceous earth in table salt in 12.1.1 (AFSC) - suggests that as 12.1.2 is permitted schedules 2, 3, 4 additives, not necessary for additional additive permissions - suggests that as 12.1.3 is permitted schedules 2, 3, 4 additives, listings for 355 and 357 not required - suggests that magnesium acetate; ammonium, calcium and magnesium adipate; magnesium citrate; ammonium and potassium glutamate; ammonium chloride; ammonium, calcium, magnesium and potassium succinate; ammonium and magnesium tartrate; glutamic acid; colloidal silica be included in 12.1.3 salt substitutes, or in schedule 2 - suggests that entry for 12.3 should read "schedules 2 and 4", and specific permission for colours in schedule 3 be removed - queries whether references to the R standards are correct - suggests that sodium, potassium and calcium salts of lactic, malic and citric acids be permitted in 14.1.2.1 - suggests subheading in 14.1.2.2 "fruit drink including fruit cordial" - suggests subheading in 14.1.3 "water based flavoured drinks including flavoured cordials" - suggests that 1102 be removed from 14.1.2.2 as in schedule 2 	<p>changes made</p> <p>generally permitted processing aid changes made justified on public health and safety grounds</p> <p>changes made rectified by P150</p> <p>processing aid changes made</p> <p>changes made</p> <p>commodity review</p> <p>changes made</p> <p>changes made commodity review</p> <p>guidelines should assist in understanding</p> <p>changes made</p>
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AFGC cont.	<ul style="list-style-type: none"> -suggests GMP levels for cyclamates and saccharin in 14.1.3; alternatively suggest 20g/kg and 1.5g/kg respectively (AFSC) - suggests caffeine be permitted at 200mg/kg in 14.1.3 kola type drinks (NZFR) - suggests phosphoric acid be permitted in 14.1.3 kola type drinks at GMP (NZFR) - further suggests that kola type drinks subcategory be omitted, and provisions remain for all water based flavoured drinks (NZFR) - suggests quinine at 100mg/kg and gentian at GMP be permitted in 14.1.3 - suggests cyclamates at 600mg/kg in brewed soft drinks (AFSC) - suggests 14.1.5 read “additives in schedules 3 and 4...” - suggests category 14.1.5 requires further consideration; some products previously classified as miscellaneous foods may be in this category, not permitted colourings; suggests use of wording “hot beverage” incorrect - queries where dry mixes for beverages are classified - suggests that hydrogen peroxide at 1mg/L and tannins at GMP be permitted in 14.2.4 - suggests heading in 20 Mixed foods “sauces, syrups and toppings etc” - suggests following additives under new heading: sucrose acetate isobutyrate 200mg/kg, dioctyl sodium sulphosuccinate 10mg/kg, glycerol esters of wood rosins 100mg/kg - suggests entry for EDTA be extended to all sauces and toppings - suggests canned soups be assigned a subheading in 20 with provision for nisin at GMP (AFSC) - suggests that additives in schedule 2 should be listed in alphabetical order - suggests sodium silicate be included in schedule 2 - supports inclusion of acesulphame potassium in schedule 2 provided there are no public health and safety problems - suggests that gold, silver, aluminium be included in schedule 3 (NZFR) - suggest turmeric be included as a separate entry (or perhaps in brackets after curcumin) for clarity - generally supports overall thrust and direction of P150 - states is consistent with international trends - suggests it will benefit industry, consumers, and ANZFA - suggests a mechanism put in place to correct errors quickly in future 	<p>ADI issues</p> <p>commodity review/application</p> <p>ADI issues</p> <p>commodity review</p> <p>ADI issues</p> <p>changes made</p> <p>changes made</p> <p>mixed foods usually</p> <p>commodity review</p> <p>guidelines</p> <p>changes made</p> <p>changes made</p> <p>permission in fruit and vegetables, not needed in mixed food</p> <p>ADI issues</p> <p>ADI issues</p> <p>ADI issues</p>
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AFGC cont.	- suggests development of a “users guide” explaining categorisation system, how prohibitions and permissions operate within hierarchical numbering system would be useful	
Australian Food Industry Science Centre	- requested that applications A252, A302 and A319 be incorporated into proposed draft.	changes made
Australian Fruit Juice Association	<ul style="list-style-type: none"> - suggests indenting sections of equal rank - suggests grouping additives in sch 2 according to function - request permission for fibre to be added to food - no category for functional foods - suggests that 13.5 Supplementary foods for dietetic uses should refer to Standard R9 not R3 - request permission for ascorbic acid to be used as an antioxidant in fruit juices - request permission for nitrogen to be used as a pressurising agent in fruit juices - request permission for salt to be added to food - 14.1.2.1 requires additional preservatives - states there are no provisions for concentrated fruit juices, concentrated fruit drinks and cordials - supports NZ Juice Association in not differentiating between juices made from concentrate and not made from concentrate; requests that both should be permitted sch 2, 3, 4 additives, as well as flavours - requests that all intense sweeteners be permitted in water based fruit drinks in 14.1.2.2 	<p>formatting formatting not within the scope of P150 none required currently</p> <p>currently permitted in accordance with A9 specifications; ∴ not an additive processing aid</p> <p>salt is not an additive additional information was requested (no further data was supplied) see clause 5(1)</p> <p>changes made</p> <p>all permitted</p>
Beer, Wine and Spirits council of New Zealand	<ul style="list-style-type: none"> - endorses Australian Associated brewers submission - request caramel at GMP in beer (as per NZ, US, UK) - request ascorbates, erythorbates and propylene glycol alginate at GMP (as per NZ) - request permission for use of flavourings 	<p>changes made changes made</p> <p>changes made</p>

BRI Australia Ltd	<ul style="list-style-type: none"> - does not support the inclusion of a definition for bread being included in P150 (should be in bread standard) - does not support unity principal in relation to bread (no restriction currently) - refer to application submitted in Aug 1997 regarding sodium and calcium lactylates limits being lifted to GMP in bread and bread products - currently permit vegetable gums, emulsifiers, acetic acid, sodium diacetate and calcium acetate in bread, not permitted in P150 - concerns regarding colours (ask if 161b lutein the same as 161 xanthophylls). Currently permit 161, 123, 160b at no limit, suggest same for P150 - suggests that breadcrumbs be considered a mixed food, for additive permissions - request that hydroxypropyl cellulose be permitted (as per NZFR) 	<p>changes made</p> <p>current restriction applies (A4)</p> <p>changes made</p> <p>changes made</p> <p>ADI issues</p> <p>breadcrumbs sold for use in foods, therefore permission in final food</p> <p>no data</p>
Bronson & Jacobs* (two submissions received)	<ul style="list-style-type: none"> - extend permission for calcium propionate (282) and sodium propionate (281) in: <ul style="list-style-type: none"> 0.1 Preparations of food additives; 1.6 Cheese and cheese products; 2.2.2 Fat emulsions (<80% oil); 4.3.1 Dried fruits and vegetables; 4.3.4 Fruit and vegetable spreads incl. jams, chutneys and related products; 4.3.6 Fruit and vegetable preparations incl. pulp; 11.1.2 Fruit and vegetable juices and fruit and vegetable juice products; 11.1.3 Water based flavoured drinks; 14.2 Alcoholic beverages (incl. no and low alcohol); 14.3 Mixed alcoholic drinks not elsewhere standardised; 20 Mixed foods. - extend permission for calcium acetate (263) in: <ul style="list-style-type: none"> 0.1 Preparations of food additives; 11.1.2 Fruit and vegetable juices and fruit and vegetable juice products; 14.2.1 Beer and related products; 14.2.2 Wine, sparkling wine and fortified wine. - expresses concern over no additives being permitted in plain bread 	changes made
Buderim Ginger Ltd	<ul style="list-style-type: none"> - request permission for sulphur dioxide in 4.3 Processed fruits and vegetables at 20mg/kg 	changes made

Bulmer Harvest	<ul style="list-style-type: none"> - suggests that differentiating between ingredients, additives and processing aids can be difficult eg. salt; therefore consistency is important - "the extensive use of the concept of GMP leaves the actual levels permitted open to considerable interpretation and debate" - states that the lowest possible level to achieve the desired effect has sometimes not been determined - suggests it is preferable to establish specified maximum levels for many food additives - suggests that were an additive is limited in one sub-category, it should be limited in the entire category - suggests that the unity rule of 1 is unreasonably low - suggests that additives permitted in 14.2.4 Fruit wine, vegetable wine and mead are extremely limited and do not reflect current practise - states that there are inconsistencies between 14.2.4 and 14.2.2 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
Calorie Control Council	<ul style="list-style-type: none"> - supports polyols being included in schedule 2 - requests that all intense sweeteners be included in schedule 2 (otherwise consumer choice restricted, amount product added self-limiting, consumption surveys indicate intake below ADI) 	ADI issues
Castle Chemicals (verbal - 22.12.98)	<ul style="list-style-type: none"> - current regs: mixtures used for the coating of citrus fruit may contain not more than 250 mg/kg of oxidised polyethylene: needs to be included in P150 - requests inclusion of wood rosin as a food additive 	<p>changes made</p> <p>application needs to be made</p>
Confectionery Manufacturers of Australasia	<ul style="list-style-type: none"> - requests permission to use emulsifiers and modifying agents in cocoa and chocolate products - request permission to use amaranth in chocolate - requests that annatto be permitted as per previous drafts at 20mg/kg - queries why cherries permitted to use erythrosine and not the confectionery industry - queries why BHT is not permitted in edible fats and fat emulsions 	<p>changes made</p> <p>changes made</p> <p>changes made</p> <p>ADI issues</p> <p>changes made</p>
Dairy Co-operative (NZ) Ltd	<ul style="list-style-type: none"> - request permission for use of schedule 2 additives in UHT goat milk - request permission for use of sodium hydroxide 	<p>changes made</p> <p>processing aid</p>
Devro Teepak	<ul style="list-style-type: none"> - requests permission for annatto in edible collagen casings be increased to 100mg/kg in the manufactured meat 	changes made

Dietitians Association of Australia	<ul style="list-style-type: none"> - supports P150; states this will enhance consumer confidence and encourage innovation - suggests a maximum level of sulphite in wine, and fish and fish products 	limited in fish and fish products; wine permissions to be amended on advice from commodity review
Elaine Attwood	<ul style="list-style-type: none"> - rejects concept that innovation is desirable for consumers - does not support concept of GMP - suggests that RIS is flawed or biased - does not support international harmonisation - questions enforcement of new Code - supports option 3 in full assessment report 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
Embassy of the United States of America	<ul style="list-style-type: none"> - suggests that the definition of food additives would be better placed in the definitions section - recommend that P150 harmonise as much as possible to Codex food category system - states that there is no section for snacks (which Codex does provide) - potassium sorbate and propyl gallate missing from chocolate related items (in AFSC and NZFR) 	<p>defines a cultural way in which food is eaten; not related to technological function</p> <p>usually sugar confectionery coated in choc (permission in sugar confectionery)</p>

<p>Flavour and Fragrance Association of Australia and New Zealand (FFAANZ)</p>	<ul style="list-style-type: none"> - support a general standard for food additives consistent with international requirements - concerned over the lack of provisions for carriers and diluents - request that EDTA and its salts be permitted either as processing aids or additives, as sequestrants - raises point that sch 2, 3, and 4 additives now permitted in flavourings, which is not the case now - discuss labelling issues relating to flavours - queries why a food additive definition does not appear in the definitions section; questions the legality of clause and definitions - recommends that second sentence in first paragraph of standard should read "Food additives are differentiated from processing aids..." - recommend amending second sentence of second paragraph: the standard should regulate the addition of substances (ie, some are present naturally) - suggest that one term be used, instead of both 'maximum permitted level' and 'maximum permitted limit' - states Clause 4 is convoluted and does not assist ready understanding of the clause; further states it refers to two technological functions (sweetening and flavour enhancement) but this is not reflected in the title or editorial note - suggests rewording of Clause 8 to indicate that additives permitted must comply with the requirements of sch 1 - suggests that explanatory notes for sch 1 would be helpful; currently it is confusing - suggests rewording "...unless expressively permitted below", as many times not permitted below - suggests that use of word "only" in application column of sch 1 be consistent; currently not always used: is there a difference between when used and when not used? - permissions for addition of caffeine, gentian and quinine not included for soft drinks - antifoaming agents, carriers and diluents missing from sch 5 - queries exclusion of draft food identification system: is this to be progressed? as an information paper? 	<p>processing aids changes made</p> <p>labelling review</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>appear to be well understood by industry</p> <p>changes made</p> <p>guidelines have been developed</p> <p>changes made</p> <p>changes made</p> <p>flavourings are in schedule 2</p> <p>processing aids yes - form the basis of guideline</p>
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Food Intolerance Network	<ul style="list-style-type: none"> - suggests that the definition of public health and safety is too narrow - suggests that methodology used to assess food additive intake and safety is flawed - suggests that consumers are exposed to higher levels of food additives than necessary - does not support GMP concept - suggests that there is an absence of post-approval monitoring, consumer input and consumer responsiveness - requests that additives with known effects on health, behaviour or learning in a significant segment of the population be identified within the schedules - suggests that the proposal does not meet its claim to protect public health and safety 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
Food Safety Victoria	<ul style="list-style-type: none"> - supports P150; states it is clearly driven by safety outcomes - suggests that a number of commodities require definitions, eg. semi-preserved fish - notes inconsistencies between review of dairy products and P150, eg. flavoured milks as a mixed food - suggests that by inappropriately assigning products to mixed foods category will undermine the user-friendly outcome and will not promote clear consumer education 	<p>commodity review</p> <p>commodity review</p>
Food Technology Association Victoria Inc.	<ul style="list-style-type: none"> - all proposals should be consistent eg. P185 says flavoured liquid milks are mixed foods, whereas P150 does not - sch 2 difficult to interpret; it should be made clear that all additives can be used in any quantities (as per GMP) in any sch 1 food - queries definition for GMP as applicable to the food industry 	<p>commodity review</p> <p>is applicable; clearly mentions food industry</p>
Form letter (25 received)	<ul style="list-style-type: none"> - states that colours are unnecessary - supports ASEHA's proposal - suggests that the following food additives be banned: 102, 107, 110, 122-129, 133, 142, 151, 155, 160b, 200-203, 210-213, 220-228, 249-252, 280-283, 310-321, 621 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
Fruitmark	<ul style="list-style-type: none"> - refers to amendment 37, and states that this has not be incorporated in drafting. - include modifying agents in Group I, II, III table 1 Std A10 	changes made

Golden Circle	<ul style="list-style-type: none"> - suggests indenting be used in schedule 1 to aid in clarity - suggests that food additives listed in schedule 2 be grouped according to their functions, as listed in schedule 5 - suggests that provisions for fibre need to be included - suggests a category for functional foods is required - states 4.2 is not suitable for frozen avocado, as minimum processing is used; vitamin C and/or erythorbic acid as antioxidants, and food acids for pH adjustment and/or flavour enhancement - suggests 4.3.5 should include glacé fruits and vegetables in the heading - suggests 5.1 needs to specify which colours are permitted on surface only - queries whether references to R standards are correct - states schedule 2 minerals disallowed in 14.1.1.1 - queries if no additions are permitted in 14.1.1.2 - suggests ascorbic acid be permitted as an antioxidant in fruit juices - suggests nitrogen be permitted as a pressurising agent in fruit juices - if salt is added to fruit juice for flavour enhancement, is this a mixed food - if sugar is added to a fruit drink or cordial is it a mixed food - suggests there is not adequate permissions for preservatives in fruit and vegetable drink products; states carry over is not sufficient; requests same levels of sorbic acid, benzoic acid, sulphur dioxide as in 14.1.3 - requests carbon dioxide in 14.1.2.2 - suggests it is not clear that preservative permissions relate to 'made up as directed' with cordials or fruit drink concentrates - states no provision for caffeine to be added to kola type products 	<p>formatting formatting</p> <p>fibre is not a food additive</p> <p>clearly states sch 3 and 4 permitted, therefore application applies to these colours</p> <p>not performing a technological function; therefore not an additive; to be considered elsewhere schedules 2, 3 and 4</p> <p>processing aid commodity review commodity review changes made</p> <p>schedule 2 additives permitted</p> <p>commodity review / application</p>
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Goodman Fielder	<p>Drafting</p> <ul style="list-style-type: none"> - suggests change sentence 3 in drafting to read “Food additives are distinguished from processing aids...” - definition for maximum permitted limit, use terminology for maximum permitted level - do not believe definition for bread necessary in P150 - suggests change clause 6 to “...preservative X or 20mg/...” - clause 8 needs clarification: suggests “A food intended for use in the manufacture of another food may contain any or all additives in a quantity proportional to their permitted levels in the final food” - clause 10: New Zealand permits all lakes, not just calcium and aluminium <p>Schedule 1</p> <ul style="list-style-type: none"> - amendment 31 permits 20mg/kg annatto in edible fats and fat emulsions, and all colours permitted in all fats and oils other than olive oil: suggests a separate entry for olive oil to prohibit sch 2, 3, 4 additives - xanthophylls currently permitted, P150 refers only to lutein: suggests including all 161 colours in sch 3 - suggest ice confection sold in liquid form be called “ready to freeze ice confection” - peeled and/or cut fruits and vegetables need vegetable gums etc - suggest jelly be listed as a mixed food, as not all jellies are fruit based - suggests it is inconsistent to permit 300mg/kg amaranth in confectionery and fish roe, when all other colours permitted at 290mg/kg - suggest that 6.4 could cover all flour and bakery products, item 7 being used only for bread - 6.2 and 7 can have both sorbates and propionates, however unity rule will limit combinations; industry needs higher levels (or exclusion from unity rule) - 6.4 and 7 restrict lactylates, although they have a high ADI, and are unlimited in New Zealand - request that processed cereal and meal products be permitted to contain 100mg/kg annatto, and not just for breakfast cereals (eg burger rings excluded) 	<p>changes made</p> <p>changes made</p> <p>changes made changes made changes made</p> <p>does not appear to be true</p> <p>changes made</p> <p>changes made</p> <p>changes made changes made EU permit level - potential barrier to trade</p> <p>if functions are different, the unity principle is not relevant</p> <p>changes made</p> <p>changes made</p>
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Goodman Fielder cont.	<ul style="list-style-type: none"> - plain breads should only prohibit sch 3, 4 additives - if cordials regulated under either 11.1.2.2 or in 11.1.3, cyclamate and saccharin levels too low; suggests inclusion as a mixed food - query omission of nisin at GMP in sauces, toppings etc. in mixed foods - express concern over differences in annatto permissions for liquid and solid foods (eg, is spoonable mayonnaise a liquid?); suggest specify as beverages instead - suggest that sch could also be presented in numerical order 	<p>changes made 'made up as directed'; permissions should be adequate</p> <p>changes made changes made</p> <p>formatting</p>
Grocery Manufacturers of America	<ul style="list-style-type: none"> - states that there is no section for snacks (which Codex does provide) - potassium sorbate and propyl gallate missing from chocolate related items (in AFSC and NZFR) - recommend that P150 harmonise as much as possible to Codex food category system 	<p>defines a cultural way in which food is eaten; not related to technological function</p> <p>usually sugar confectionery coated in choc (permission in sugar confectionery)</p>

Western Australian Food Advisory Committee	<ul style="list-style-type: none"> - supports option 3 (develop standard based on sum of Aust and NZ food additive permissions) - suggests that maximum limits be applied to polydextrose, isomalt and lactitol (due to laxative effects) - suggests that maximum limits be applied to aspartame and sucralose, as per current AFSC - queries why some food groups not included eg. yoghurt - suggests that maximum limits be applied to caffeine at 145mg/kg and a labelling declaration be required - suggests that maximum limits be applied to quinine and sulphur dioxide - suggests that instructions for the calculation of ascorbic acid and its salts and erythorbic acid and its salts be included in Clause 5.2 - suggests that colour 143 Fast Green FCF not be permitted for use, as not currently permitted in Australia - suggests that additives not be permitted in foods labelled “pure”, “100%”, or “natural”; excluding “natural” colours and flavours - suggests that the use of certain additives needs to be stipulated where the quality descriptors “fresh”, “real/ genuine” and “traditional” have been applied to foods 	<p>the definition of a bulking agent will restrict the usage (ie, when used in bulk, does not comply with P150)</p> <p>no data provided; dietary assessment shows restrictions not required</p> <p>yoghurt is either in 1.2.1, 1.2.2 or 20, depending on formulation</p> <p>Proposal P161 is dealing with this issue</p> <p>no data provided</p> <p>currently permitted in NZ</p> <p>another proposal; outside of scope of P150</p>
Home Economics Institute of Australia Inc.	<ul style="list-style-type: none"> - request that maximum levels be set for all food additives - request that more definitions be provided to limit number of foods in mixed food category - suggests foods should be considered on a case-by-case when deciding on the prescriptiveness of the standard 	<p>all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150</p>
InforMed Systems	<ul style="list-style-type: none"> - suggests that the schedules are old, extremely prescriptive forms of the old Code, and are inconsistent, incomplete and do not include some recent NZ items - queries why annatto is not permitted for use in flavoured milks; suggests that annatto may have been omitted from schedule 3 by error - requests permission to add carrageenan to reduced fat and skim milk to which calcium has been added (as per NZFR) - suggests that ANZFA reconsider permissions for the use of colour; if level restricted, wider permissions should be included 	<p>ADI issues; annatto is permitted in flavoured milks</p> <p>permitted under P150: category 1.2.1</p> <p>ADI issues; where colour is limited it is done so as to restrict the usage</p>

International Sweeteners Association*	<ul style="list-style-type: none"> - generally supports P150 - requests that 950 Ace K be included in schedule 2 - suggests that Clause 5 included “saccharin and its salts shall be calculated as free imide” and “cyclamates shall be calculated as free acid” - requests that 950 Ace K, 952 cyclamates and 954 saccharin be permitted for use in 11.4 Tabletop sweeteners, 11.4.1 and 11.4.2 at GMP levels - suggests that “blending [of intense sweeteners] should be accepted on the ‘add on basis’”; object to unity rule as no scientific evidence to use any group ADI at least for sweeteners - supplied an extensive list of additives to be permitted in tabletop sweeteners 	<p>ADI issues changes made</p> <p>ADI issues</p> <p>based on technological function, not on maximum permission without comprising ADI</p> <p>mostly permitted as processing aids</p>
Melrose Laboratories	<ul style="list-style-type: none"> - requests inclusion of soy flour, pea flour, herbal extracts and sodium chloride 	these are not food additives
Ministry of Agriculture, Republic of Indonesia	<ul style="list-style-type: none"> - concerned about differences between Codex and P150 with respect to trade between Indonesia and Australia - suggests that P150 should be as similar to Codex as possible 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
Ministry of Commerce, New Zealand	<ul style="list-style-type: none"> - supports P150 and option 4 - supports aims of P150 - supports use of technological function in regulating food additives - supports international harmonisation - suggests standard should be welcomed by industry and consumers as an important aspect of public health and safety - comments on additive permission for beer, however supports proposal - suggests additives for wine will be reviewed when joint wine standard is introduced - considers that while option 4 includes a greater cost to government, benefits outweigh costs 	<p>commodity review</p> <p>commodity review</p>

Ministry of Health New Zealand	<ul style="list-style-type: none"> - Codex definition of GMP should not be an editorial note, rather a proper definition - definition of a food additive should be in the definitions section, should be worded: "...not normally used as a typical food ingredient..." as more consistent with Codex and clearer - definition should contain reference to fact that processing aids and minerals and vitamins not included in this standard - request a clearer definition of processed foods - suggest reformatting on a category by category basis to increase clarity and expedience - does not believe quality descriptors would qualify the definition of GMP; paragraph should be deleted or rephrased - paragraph to describe carry over omits key elements of Codex definition and Regulation 247 of NZFR resulting in ambiguity; suggest adoption of Codex definition - suggest revert to old format of permissions listed on a category by category basis - current drafting not very straightforward, subject to a great deal of interpretation, creates confusion, not clear what processed foods are - queries use of GMP with additives with numerical ADIs - queries the scientific rationale behind GMP for sulphur dioxide in wines, when limited in all other foods - request that additive permissions for category 13 be included - suggest that by excluding additives that are listed in Codex may constitute a technical barrier to trade - recognise inherent difficulties in predicting future use patterns, however request that monitoring occurs - notes that croscarmellose (artificial sweetener), L-leucine, glycine omitted 	<p>no justification provided</p> <p>changes made</p> <p>included in P150</p> <p>formatting</p> <p>changes made</p> <p>formatting</p> <p>formatting, guidelines</p> <p>no examples provided; dietary modelling used</p> <p>commodity review</p> <p>no evidence of use currently</p> <p>changes made</p>
Mitsubishi-Kagaku Chemical Corporation*	<ul style="list-style-type: none"> - requests 473 sucrose esters of fatty acids in 5.1 cocoa and chocolate products (for cocoa and chocolate drinks) as an emulsifier at 10,000 mg/kg - requests 473 sucrose esters of fatty acids in 11.1.5 coffee, coffee substitutes etc. (milked coffee and tea) as an emulsifier at 5000 mg/kg 	<p>mixed foods, permission already granted at GMP levels</p>

Monsanto	<ul style="list-style-type: none"> - supports P150; particularly changes in permissions to intense sweeteners - states P150 is user-friendly - queries exclusion of additives in 5.1 Cocoa and Chocolate Products - requests that aspartame be permitted in 14.1.2.1 Fruit and vegetable juices - requests that current level of 150mg/kg of aspartame in 14.1.3 Electrolyte drinks be changed to GMP level - requests that other intense sweeteners be permitted in 14.1.4 Coffee, coffee substitutes etc.; suggests all intense sweeteners be permitted at either GMP or a specific level be set 	<p>ADI issues</p> <p>ADI issues</p> <p>ADI issues (are these currently permitted?)</p>
National Council of Women of Australia	<ul style="list-style-type: none"> - does not support GMP - does not think P150 presents the most effective means of achieving the aim of ensuring that public health and safety is protected - does not support alignment with international regulations - does not agree that innovation will benefit consumers - suggests that P150 will result in more food additives being used in more foods with cheaper, less nutritious ingredients being used 	all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150
National Meat Association of Australia	<ul style="list-style-type: none"> - supports aims of P150 - requests that new Food Standards Code be consistent with titles and definitions (eg. meat standard uses same categories as P150) 	

Nestle	<ul style="list-style-type: none"> - supports Australian Food Council submission - commends ANZFA for standard of work in P150 - suggests a time period be set aside whereby draft standard can be altered without applications being lodged - suggest that isopropyl alcohol, ethyl acetate, calcium sodium aluminosilicate, calcium hydroxyphosphate, salts of EDTA, sterile diatomaceous earth, benzyl alcohol for culinary essences etc. be included in flavouring standard - request that yoghurt be permitted polydextrose and groups I and VI modifying agents (as per AFSC) - request that carbon dioxide be permitted in fermented milk products (for some yoghurt drinks) - queries the UHT cream additive permissions - requests that sodium phosphates, sodium alginates and carrageenan be permitted in reduced fat cream (as per NZFR) [cream used for dip preparations by consumers] - requests that potassium chloride be permitted in butter, margarines, fat emulsions (as per AFSC) - request permission for amaranth in ice cream and edible ices (as per AFSC) - request permission for emulsifiers and intense sweeteners in chocolate (as per AFSC) - suggests that ANZFA needs to consider including additives that are currently being considered at Codex - states that standard R4 does not permit sch 2, 3, 4 additives in category 13.3 - queries whether correct R standards have been referenced in category 13 - queries why ammonium chloride (510) is not in sch 2, or any other schedule 	<p>changes made; some considered processing aids (no flavouring standard proposed) permitted in 1.2.2</p> <p>permitted in 1.2.2 or 20</p> <p>permitted in 1.4.2</p> <p>changes made</p> <p>changes made</p> <p>changes made</p> <p>will consider when adopted by Codex</p> <p>commodity review commodity review generally permitted processing aid</p>
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New Zealand Dairy Board	<ul style="list-style-type: none"> - supports GMP concept in principle - states "[Codex] is conspicuous in its absence in P150" - concerns over additive permissions for butter - request a section to be called protein products (eg, caseinate with additives 339, 340, 341) - request that all Codex additive permissions be included in P150 - require definition for what the maximum permitted levels apply to (ie, amount present in food, or amount allowed to be added) - confusion over how much milk is needed in a liquid milk-based drink; what is a rennet preparation? - require definitions for solid and liquid foods in 20 mixed foods - query why flavourings and antifoaming agents are not considered in P150 - suggest that Clause 5 (2) should be included in sch 1 for ease of use - query the definition of a food additive - is this a proper definition, or is one provided elsewhere? - definitions of technological functions should be inclusive not exclusive (to allow for new functions); request addition of decolourising agents - queries definition for processed food (is pasteurisation and standardisation a process?); status of editorial note - queries editorial note in Clause 3; states that P156 should apply - queries inclusion of 'modified milk' in 1.1.1 - requests permission for carrageenan in skim milk or non-fat milk where calcium is added - request that carmoisine be permitted in 1.1.2 - request annatto limit be increased to 20mg/kg - request additive permissions for yoghurts - request permission for benzoic and sorbic acid in rennet preparations - request permission for flavours and colours in rennet preparations 	<p>changes made permission in final product through carry over, not in food ingredient</p> <p>see Clause 5</p> <p>fair trading law regulates</p> <p>changes made flavourings included; antifoaming agents are processing aids would not aid in clarity</p> <p>decolourising agents are colours, and hence regulated as such</p> <p>changes made changes made 1.1.2 permits schedule 2 additives</p> <p>is permitted, listed currently as azorubine (altered to acknowledge both names) ADI issues modified yoghurts permitted schs 2, 3, and 4 in categories 1.2.2 or 20 permitted in 0.1 renneting enzymes permission in renneted milk, where these additives are added</p>
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New Zealand Dairy Board cont.	<ul style="list-style-type: none"> - requests that proposed Codex draft standards' additive permissions be included - request that sour cream be identified in heading of 1.4.2- requests that nisin be permitted in all 1.4.2 foods - requests that all creams be permitted schs 2, 3 and 4 additives - request permission to add polyoxyethylene (20), sorbitan monopalmitate (40), (434) and propylene glycol mono- and di-esters in 1.5 (as per NZFR) - request permission to add dimethylpolysiloxane (900), diphosphates (450), tricalcium orthophosphate (341iii), magnesium oxide (530), potassium aluminium silicate (555), L-ascorbic acid in 1.5 (as per Codex) - request permission to add sodium bicarbonate (500) to 1.5 - request permission to add sodium stearoyl lactate (481) to ripened cheese - suggests that reformed cheese be deleted from title "processed and reformed cheese" - requests adding beta-carotene and emulsifiers to processed cheese - states have difficulties understanding category 2 - requests adding sodium hydroxide (524) to anhydrous milk fat - requests permission to add lactic acid and potassium chloride to butter - states have difficulties interpreting structure based on an hierarchy 	<p>will be considered when included in a Codex standard changes made</p> <p>changes made all modified creams have these permissions 1.5 permitted sch 2; changes made</p> <p>900 listed as polydimethylsiloxane; 450 as pyrophosphates; 341 as calcium phosphates; ascorbic acid all in sch 2 530 permitted under 1.5;</p> <p>in schedule 2 permitted</p> <p>changes made</p> <p>in schedule 2 changes made generally permitted processing aid changes made</p>
New Zealand Juice Association	<ul style="list-style-type: none"> - requests that flavours, natural colours and ascorbic acid be permitted in 14.1.2.1 Fruit and vegetable juices - requests a definition of fruit and vegetable juice products to allow differentiation from fruit and vegetable juices - queries why preservatives are excluded from 14.1.2.2; states they are currently permitted in NZFR - queries why there are differences in types of intense sweeteners permitted in fruit drinks, water based flavoured drinks and brewed soft drinks - queries why annatto is only permitted in fruit and vegetable juice products and not in water based flavoured drinks 	<p>permitted in concentrate; may change</p> <p>commodity review</p> <p>250mg/kg SO₂; 1000mg/kg benzoic acid & sorbic acid + salts ADI issues / technical need</p> <p>other acceptable colours can be used, ADI concerns with annatto</p>

New Zealand Nutrition Foundation	<ul style="list-style-type: none"> - suggests that the schedules are old, extremely prescriptive forms of the old Code, and are inconsistent, incomplete and do not include some recent NZ items - queries why annatto is not permitted for use in flavoured milks; suggests that annatto may have been omitted from schedule 3 by error - requests permission to add carrageenan to reduced fat and skim milk to which calcium has been added (as per NZFR) - suggests that ANZFA reconsider permissions for the use of colour; if level restricted, wider permissions should be included 	<p>ADI issues; annatto is permitted in flavoured milks permitted under P150: category 1.2.1</p> <p>ADI issues; where colour is limited it is done so as to restrict the usage</p>
Nutrinova	- requests inclusion of Ace K in schedule 2 (dietary analysis information supplied)	ADI issues
Office of Regulation Review	- comments regarding structure of document, in particular RIS statement	
Palsgaard Industri	- request 422 ammonium salts of phosphatidic acid be permitted in 5.1 cocoa and chocolate products, as per current regs, at 15g/kg	changes made
Pillsbury*	<ul style="list-style-type: none"> - requests 211 sodium benzoate in 7 Breads and bakery products and 7.2 Biscuits, cakes and pastries as an inhibitor in added fruit, frostings and icings at 1000mg/kg - requests 385 EDTA in 7 and 7.2 to inhibit oxidative rancidity at 20mg/kg - requests 481 sodium lactylate in 7 and 7.2 as an emulsifier (no level specified) - request 234 nisin in sauces as mould inhibitor at GMP level (justification includes: no viable alternative; no specified ADI; neutral flavour; considered a safe and natural preservative; cost will restrict usage) 	<p>carry over principle applies, permitted in mixed foods</p> <p>carry over? changes made</p> <p>changes made</p>

Roche Vitamins	<ul style="list-style-type: none"> - supports P150 - suggests that 307 be called α-tocopherol instead of current listing as tocopherol, d-alpha-, concentrate, as per Codex and EU definitions. - requests that ascorbic acid be permitted in 6.2 Flours, meals and starches as a dough improver/conditioner at GMP level, as per Codex and EU regulations - requests that ascorbic acid be permitted in 14.1.2.1 Fruit and vegetables juices as an acidity regulator and preservative at GMP level, as per current regulations - suggests that 304 ascorbyl palmitate, ascorbyl stearate, and 307 tocopherol be included in schedule 2 - suggests that schedule 3 include commercially available forms of colours (example given is carotenes as powders, emulsions or fluid suspensions with potencies ranging from 1-30%) - suggests that wherever a Codex standard has been adopted that this be accepted in new food additives standard - identifies spelling error (301 sodium ascorbate) - suggests schedule 1 shows discontinuity in food classes (15-19 missing) 	<p>known in Aust and NZ as per current listing evidence of need for use by industry not provided</p> <p>processing aid?</p> <p>changes made</p> <p>would not aid in clarity; would make interpretation very difficult</p> <p>reserved for future use</p>
Safe Food Campaign	<ul style="list-style-type: none"> - does not support GMP for frozen fish, seafood, wine and salt - suggest that definition of GMP too ambiguous and open to interpretation - request maximum additive levels (quotes NHMRC justification of use of food additives) - suggests that synergistic test of additives and pesticides be perform to evaluate safety - requests that 950 Ace K, 160b annatto, benzoic acid, cyclamates, sulphur dioxide, 150 caramels, nitrates, 102 tartrazine, 110 sunset yellow, 120 cochineal, 122 azorubine, 123 amaranth, 134 ponceau 4R, 127 erythrosine, 129 allura red AC, 132 indigo carmine, 133 brilliant blue, 142 green S, 151 black PN, and 155 brown HT, be banned - suggests public awareness and education could make use of colourants unnecessary 	<p>no data provided</p> <p>all issues have been dealt with previously either in the Policy paper or in the full assessment report of P150</p>

Sealord Group Ltd	<ul style="list-style-type: none"> - supports P150 - suggests classify categories as: unprocessed, therefore no additives permitted unprocessed, defined additives permitted processed, therefore can contain any additives in the schedules processed, may contain any additives in the schedules plus specific additional additives - states ANZFA was advised of errors/omissions, and had not acted on them 	formatting
Unilever Foods	<ul style="list-style-type: none"> - supports P150 - requests permission for the use of BHT in 2 Edible Fats and Emulsions (as per NZFR, Codex) at 100ppm - requests permission for the use of amaranth in 3 Ice Creams and edible ices at 290mg/kg (current AFSC) - requests permission for the use of schedule 2 additives in 14.1.5 Coffee, coffee substitutes etc., to allow for the use of flavourings, colourings and modifying agents (table 1 of A10); request an minimum requirement for herbal infusions 	<p>changes made</p> <p>changes made</p> <p>changes made</p>

* denotes more detailed information on justification of request provided in submission