

### Submission on Proposal P298 : Benzoate and Sulphite permissions in Food

PLC NZ Limited is a contract food manufacturer supplying products to both Australia and New Zealand, including the main supermarket food chains. We manufacture a wide variety of shelf stable products including dressings, sauces, toppings, marinades and drink concentrates.

#### **We support Option 1. “Maintain the status quo by not altering permissions for benzoates and/or sulphites.”**

We would like the addition of benzoates to foods to continue being allowable at the current rates. The products we manufacture are all consumed after either diluting with water or consumed as a small addition to other foods by nature of their intended use and therefore a persons total exposure as part of a balanced diet, would not be of concern.

We only use preservatives if for some reason we are unable to hot fill a product (eg customer preference for packaging that does not withstand high heat, or equipment related).

If the use of benzoates were not permitted at all in foods, it would in most cases be difficult to find an acceptable alternative that could keep the food safe or from spoiling. In this situation and until other effective alternatives can be found, formulating to fill at high temperatures is the only choice and this would incur greater packaging costs to our customers.

We do not add sulphites to any of our products, but they are inherent in some of our ingredients (eg dried apricots, ginger, lime juice concentrate, balsamic vinegar). Quantities are reduced significantly through the heat processing used in manufacture but not all is removed. The label reflects this.

In addition and for similar reasons, we also support Option 4 to “Encourage consumers to eat a balanced diet and not over-consume foods with high levels of benzoates and/or sulphites” as we believe consumer education and awareness is always important for them to make informed purchase decisions.

We also support the general principles of Option 3 in that it is good to review the level of benzoates required and keep looking for alternative preservatives and alternative methods of preventing microbial spoilage. However their reduction or elimination by a specified date is unlikely to be feasible.