

17 December 2008 [20-08]

FINAL ASSESSMENT REPORT

PROPOSAL P279

REVIEW OF SCHEDULE 1 AND RELATED CLAUSES, STANDARD 1.3.1 – FOOD ADDITIVES

For Information on matters relating to this Assessment Report or the assessment process generally, please refer to <u>http://www.foodstandards.gov.au/standardsdevelopment/</u>

Executive Summary

This Proposal included a review of the content and relevant clauses relating to limits in Schedule 1 of Standard 1.3.1 – Food Additives in the *Australia New Zealand Food Standards Code* (the Code) for the purposes of improving clarity and operational effectiveness. This review was undertaken to address some of the comments received from stakeholders about the operation of Standard 1.3.1.

This review was not to provide a mechanism to change the substantive content or the structure, of Standard 1.3.1. In addition, the review was not intended as an opportunity to seek new or amended limits for the use of food additives in Schedule 1 of Standard 1.3.1, unless these were considered to be omissions due to anomalies or errors.

Purpose

The purpose of this Proposal was to formally review the content and relevant clauses relating to limits in Schedule 1 of Standard 1.3.1 – Food Additives and to make amendments to the provisions in the Standard to address comments received from stakeholders

Decision

FSANZ has rejected the draft variations to Standard 1.3.1 – Food Additives prepared after Draft Assessment¹.

Decision

- Taking into account comments received in the first and second rounds of consultation and based on changes made or under consideration in other standards development processes, no variations to the Code are considered necessary as part of this Proposal.
- There are no expected additional costs to food manufacturers, consumers or regulatory agencies arising from the rejection of the draft variations prepared after Draft Assessment.

Consultation

The Initial Assessment Report was circulated for a round of public comment from 15 December 2004 till 9 February 2005. The Draft Assessment Report was circulated for public comment from 13 December 2006 to 7 February 2007. Nine submissions were received. All the submissions generally supported the amendment of the Standard and raised a number of specific issues which FSANZ has considered. Where necessary, FSANZ has made amendments to the Code or will consider amendments to the Code as part of other more appropriate standards development processes to address these issues. For example, the issues raised on the editorial notes as part of Proposal P279 were considered and addressed in the Omnibus VII Proposal (P1001).

¹ The 'rejection' of the draft variations has the effect of 'abandoning' this Proposal with no amendment to the Code. The draft variations prepared after Draft Assessment are at Attachment 1.

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INTRODUCTION

The purpose of this Proposal was to formally review the content and relevant clauses relating to limits in Schedule 1 of Standard 1.3.1, to address comments received from stakeholders concerning the operation of Standard 1.3.1. This review was not a mechanism to change the substantive content or the structure of Standard 1.3.1 and was not an opportunity to seek new or amended limits for the use of food additives in Schedule 1 of Standard 1.3.1, unless these were considered to be omissions due to anomalies or errors.

A food additive is described in the purpose clause to Standard 1.3.1 – Food Additives as follows:

A *food additive* is any substance not normally consumed as a food in itself and not normally used as an ingredient of food, but which is intentionally added to a food to achieve one or more of the technological functions specified in Schedule 5 to Standard 1.3.1. It or its by-products may remain in the food.

1. Background

In June 2003, preliminary information was presented to FSANZ regarding issues and concerns with Schedule 1 of Standard 1.3.1. From these discussions, Proposal P279 was prepared and two main tasks requiring action were identified:

- 1. Confirm that the Schedule 1 food additive limits were correctly gazetted; reflecting the intent of the Standard at the time of gazettal in December 2000 and that subsequent amendments have also been correctly gazetted.
- 2. Clarify any inconsistencies and ambiguities that are recognised with this Schedule, particularly those associated with the use of the asterisk, which indicates limits for use for food additives listed in Schedules 2, 3 and 4.

1.1 Current Standard

A food additive may only be added to food where expressly permitted in Standard 1.3.1. The Standard allows for use of a wide range of food additives at levels determined by Good Manufacturing Practice (GMP). The Confederation of Food and Drink Industries of the European Community developed the basic food classification system that was used to categorise foods in Schedule 1. This system is also the basis for the draft Codex General Standard for Food Additives (GSFA).

1.2 Historical Background

Standard 1.3.1 was developed as part of Proposal P150 and included consideration of food additive provisions from the former Australian *Food Standards Code* and the former *New Zealand Food Regulations*, *1984* (NZFR) in the development of the Code. Amendments have been made to Standard 1.3.1 in accordance with approved variations as part of subsequent Applications and Proposals.

2. The Problem

Matters initially identified for review through Proposal P279 were:

- the removal of the asterisks from Schedule 1;
- the inclusion of a diagram to explain the permissions allowed through the categories;
- the qualifications column in Schedule 1;
- the editorial note to clause 4;
- clauses 7 and 8 and their practical implications;
- limits for sulphur dioxide in formulated supplementary sports foods; and
- other minor anomalies and ambiguities identified within Schedule 1.

The review was not a mechanism for considering the approval of new or amended limits for food additives in New Zealand and Australia. New or amended limits for food additives would need to be considered through the Application process in the *Food Standards Australia New Zealand Act 1991* (FSANZ Act).

3. Objectives

In developing or varying a food standard, FSANZ is required by its legislation to meet three primary objectives which are set out in section 18 of the FSANZ Act. These are:

- the protection of public health and safety;
- the provision of adequate information relating to food to enable consumers to make informed choices; and
- the prevention of misleading or deceptive conduct.

In developing and varying standards, FSANZ must also have regard to the following matters:

- the need for standards to be based on risk analysis using the best available scientific evidence;
- the promotion of consistency between domestic and international food standards;
- the desirability of an efficient and internationally competitive food industry;
- the promotion of fair trading in food; and
- any written policy guidelines formulated by the Ministerial Council.

The objectives of this Proposal were to review a number of the specific elements of Standard 1.3.1, including the consideration of issues in a manner consistent with the section 18 objectives of the FSANZ Act and with the principles of minimal effective regulation.

4. Relevant Issues

Public submissions to the Initial Assessment Report and Draft Assessment Report included comments on a number of specific issues. The summary of public submissions on the Initial Assessment Report and FSANZ's response to the issues raised are included in the Attachments to the Draft Assessment Report². The summary of submissions on the Draft Assessment Report is in **Attachment 2** and some specific issues are included below.

4.1 Removal of the asterisks (*)

The purpose of the asterisks in Schedule 1 to Standard 1.3.1 is to indicate which additives in Schedules 2, 3 and 4 are permitted for use in the particular food type. This is used in conjunction with an explanation in the general provisions of Standard 1.3.1 and editorial notes on the bottom of each page. Removing the asterisks was not intended to affect the functionality of Schedule 1, as limits are listed and explained under the relevant category headings and are also provided at the bottom of each page. As many submissions at Initial Assessment did not support the removal of the asterisks, FSANZ proposed their retention in the Standard at Draft Assessment.

Following Draft Assessment, there was one submission that remained supportive of their removal. The remaining submissions did not express opposition to the retention of the asterisks. One submission suggested a footnote on each page explaining the meaning of the asterisk. FSANZ proposes to retain the asterisks and no amendment to the Code is necessary to retain the asterisks in Schedule 1 or to retain the existing footnote in this Schedule.

4.2 Diagram to explain the limits in the categories

Since consultation was conducted on Proposal P279, FSANZ has undertaken an audit of editorial notes in the Code (P1001 – Omnibus VII). While consideration of the editorial notes in Standard 1.3.1 was originally included in this Proposal, they have been removed from further consideration. The audit was undertaken to allow further consultation on these editorial notes and to promote a more consistent approach for editorial notes throughout the Code. A diagram explaining the limits in the categories was not considered necessary or consistent with the contemporary approach for editorial notes. In any case, a diagram explaining the limits in the categories already exists in the user guide and at present, this is the appropriate place for the diagram.

4.3 **Review of the qualifications column**

The intent of the qualifications column in Schedule 1 is to assist users in the interpretation of the Schedule.

The qualifications column at present however, performs two distinct functions:

² This is available on the FSANZ website

http://www.foodstandards.gov.au/standardsdevelopment/proposals/proposalp279reviewof2804.cfm

- (a) to limit food additive additions; and
- (b) to explain limits and exemptions.

Following Draft Assessment, submissions suggested a number of amendments to the proposed draft variations in relation to the qualifications. FSANZ has considered these and determined that it would be appropriate to retain these in their current form, without amendment. This will enable industry to consider any specific changes through the usual Application process. Retaining the existing qualifications in Schedule 1 does not require any amendment to the Code.

4.4 Review of clause 7 – Carry-over of additives

Clause 7 stipulates that food additives may be present in a food as a result of the legitimate presence of food additives in an ingredient of that food. Initially, FSANZ was under the impression that this clause was unclear to some users of the Code. In submissions on the Draft Assessment, there was no opposition in submissions to the proposed approach to retain clause 7 in its current form. On this basis and in the absence of any apparent problems with its operation, FSANZ does not propose to amend clause 7 of Standard 1.3.1.

4.5 Review of clause 8 – Food for use in preparation of another food

Ingredients used in the preparation of another food (e.g. premixes) are permitted to contain any or all of the food additives permitted to be present in the final food. The maximum permitted levels of additives in these ingredients are determined by the level permitted in the final food. At Initial Assessment, FSANZ questioned the clarity of clause 8 and how the clause applied in the case of premixes used for the manufacture of several different products e.g. one with the additive permission and one without. Comments received did not generally support amending clause 8. Submissions on the Draft Assessment did not oppose the retention of clause 8 in its current form, with one submission commenting that it is clear. On this basis, FSANZ does not propose to amend clause 8 of Standard 1.3.1.

4.6 **Review of the Editorial note to clause 4**

Since consultation was conducted on the Proposal, FSANZ has undertaken an audit of editorial notes in the Code. While consideration of the editorial notes in Standard 1.3.1 was originally included, they have been removed from further consideration in this Proposal. This was undertaken to allow further consultation on these editorial notes and to promote a more consistent approach for editorial notes throughout the Code. The issues raised on the editorial notes as part of Proposal P279 were considered in the Omnibus VII Proposal.

4.7 **Review of limits for sulphur dioxide**

The minor editorial aspects of the limits for sulphur dioxide in food will be considered as part of any future omnibus-type proposal.

4.8 Other minor anomalies within Schedule 1

During consultation, submissions indicated certain anomalies in Schedule 1. These were mostly formatting or editorial issues with the draft variation which do not exist in the current Standard 1.3.1.

If future formatting or editorial issues are identified with the existing Standard 1.3.1, then industry can seek specific amendment of these through Applications or these can be considered in any future omnibus-type Proposal. No amendment to the Code is necessary to retain the existing Schedule 1.

5. **Regulatory Options**

Possible regulatory options for Proposal P279 are given below.

Option 1. Reject the Proposal, thus maintaining the status quo

Option 2. Amend Schedule 1 and other relevant clauses of Standard 1.3.1 – Food Additives.

6. Impact Analysis

6.1 Affected Parties

The parties affected by this proposal are:

- food manufacturers, importers and exporters in Australia and New Zealand;
- food additive manufacturers internationally;
- consumers in Australia and New Zealand; and
- Australian, State, Territory and New Zealand Governments involved in the enforcement of the Code.

6.2 Benefit Cost Analysis

The purpose of this Proposal was to formally review the content and relevant clauses of Standard 1.3.1. This review was not to provide a mechanism to change the substantive content or the structure of the Standard. As other standards development processes have 'overtaken' this Proposal, the impacts in terms of benefits and costs of this Proposal are now not considered to be substantive.

6.3 Comparison of Options

6.3.1 Option 1

Rejecting the Proposal, thus maintaining the *status quo* would mean that the current Standard 1.3.1 could continue to be used by those that have become familiar with it. This option would have minimal implications for industry and compliance agencies in relation to using the Code. There are no implications for consumers with this option. For these reasons, this option is preferred.

6.3.2 *Option* 2

Amending Schedule 1 and other relevant clauses of Standard 1.3.1 may further clarify the requirements, but is unlikely to be of any substantive cost or benefit for industry or compliance agencies. There are no implications for consumers with this option.

COMMUNICATION

7. Communication and Consultation Strategy

Two rounds of public consultation were held resulting in this Final Assessment. FSANZ has ensured that relevant stakeholders and other interested parties were made aware of the Proposal, and their comments sought, particularly those of the submitters, and jurisdictions which enforce the Code.

8. Consultation

The Initial Assessment Report was circulated for a round of public comment from 15 December 2004 until 9 February 2005. Fifteen submissions were received. The summary of comments on the Initial Assessment Report is at Attachment 2 to the Draft Assessment Report – Summary of Public Submissions. The main issues raised and FSANZ's position on each issue raised on the Initial Assessment Report are contained in Attachment 3 to the Draft Assessment Report – Summary of Issues Raised in Submissions.

The Draft Assessment Report was circulated for public comment from 13 December 2006 to 7 February 2007. Nine submissions were received. All the submissions generally supported the amendment of the Standard and raised a number of specific issues which FSANZ has considered. The summary of comments on the Draft Assessment Report is at **Attachment 2**. Where necessary, FSANZ has made amendments to the Code or will consider amendments to the Code as part of other standards development processes to address these issues. For example, the issues raised on the editorial notes as part of this Proposal were considered in the Omnibus VII Proposal.

8.1 World Trade Organization (WTO)

As members of the World Trade Organization (WTO), Australia and New Zealand are obligated to notify WTO member nations where proposed mandatory regulatory measures are inconsistent with any existing or imminent international standards and the proposed measure may have a significant effect on trade.

The proposed amendments were of a minor nature and aimed to improve the interpretation and usefulness of Schedule 1 and related clauses in Standard 1.3.1. This Proposal was not used to alter or amend any food additive permissions, so FSANZ did not recommend that relevant authorities notify the WTO.

CONCLUSION

9. Conclusion and Decision

The purpose of this FSANZ Proposal was to formally review specific elements of Standard 1.3.1. The review included consideration of complaints and comments received from stakeholders since the introduction of Standard 1.3.1.

Decision

FSANZ has rejected the draft variations to Standard 1.3.1 – Food Additives prepared after Draft Assessment.

Decision

- Taking into account comments received in the first and second rounds of consultation and based on changes made or under consideration in other standards development processes, no variations to the Code are considered necessary as part of this Proposal.
- There are no expected additional costs to food manufacturers, consumers or regulatory agencies arising from the rejection of the draft variations prepared after Draft Assessment.

10. Implementation and Review

As there are no amendments to the Code arising from this Proposal, there are no implementation issues to consider in relation to new requirements in the Code. FSANZ will continue to monitor the operation of Standard 1.3.1 and will continue to seek and receive information from industry, consumers and regulatory agencies about the operation of Standard 1.3.1. Where necessary and as part of other standards development processes, FSANZ will consider amendments to the Code to address issues.

ATTACHMENTS

- 1. Draft variations to the *Australia New Zealand Food Standards Code* at Draft Assessment.
- 2. Summary of Public Submissions on the Draft Assessment Report.

Attachment 1

Draft variations to the *Australia New Zealand Food Standards Code* at Draft Assessment of Proposal P279

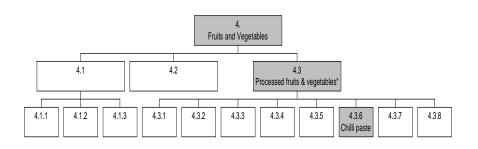
Standards or variations to standards are considered to be legislative instruments for the purposes of the Legislative Instruments Act (2003) and are not subject to disallowance or sunsetting.

To commence: on gazettal

- [1] Standard 1.3.1 of the Australia New Zealand Food Standards Code is varied by –
- [1.1] inserting immediately following paragraph 3(b) –

Editorial note:

Using chilli paste as an example, an explanation of how the hierarchical permissions for additives operate is represented diagrammatically below:



Chilli paste is a sub group of category 4.3.6 and is therefore allowed the additive permissions of those food types directly above in the hierarchy i.e. additives in categories 4.3 and 4. In addition, chilli paste would also be allowed additives in Schedules 2, 3 and 4 as indicated by the asterisk (*) at category 4.3.

[1.2] *omitting the* Editorial note *following clause 4, substituting –*

Editorial note:

Intense Sweeteners

In general, the use of intense sweeteners is limited to:

- 1. foods meeting the definition of 'reduced joule' or 'low joule';
- 2. 'no added sugars' food e.g. artificially sweetened canned fruit without added sugar; or
- 3. specific foods in which the use of the sweetener is in addition to sugars rather than as an alternative e.g. chewing gum, brewed soft drink (these foods are listed in Schedule 1 on a case-by-case basis).

Other Sweeteners

The use of sweeteners is also covered by provisions other than those in Standard 1.3.1.

Polyols, isomalt and polydextrose may be considered to be food additives when used as humectants and texturisers. Where these substances constitute a significant part of the final food, they would be regarded as a food in their own right rather than food additives. Polyols, isomalt and polydextrose are not considered to be bulking agents if used in large amounts to replace sugars, as they may contribute significantly to the available energy of the food.

Conditions relating to the use of reduced/low joule and no added sugar claims can be found in Standard 1.2.8 or in ANZFA's Code of Practice on Nutrient Claims in Food Labels and in Advertisements (Commonwealth of Australia, AGPS 1995).

[1.3] inserting in subclause 5(2) –

nitrates and nitrites as their potassium and sodium salts shall be calculated as sodium nitrite.

[1.4] *omitting from the* Editorial note *following clause 11* –

The National Registration Authority has issued a maximum residue limit for longans of 500 mg/kg in the whole fruit (see category 4 of Schedule 1).

[1.5] *omitting* Schedule 1, *substituting* –

SCHEDULE 1

Permitted uses of food additives by food type

	INS Number	Additive Name	Max Permitted Level	Qualifications
0	GENERAL PR	OVISIONS		
		Additives in Schedule 2 may be present in processed foods specified in this Schedule as a result of use in accordance with GMP where expressly permitted in this schedule.		
		Colours in Schedule 3 may be present in processed foods specified in this Schedule as a result of use in accordance with GMP where expressly permitted in this schedule.		
		Colours in Schedule 4 may be present in processed foods specified in this Schedule to a maximum level of 290 mg/kg in foods other than beverages and 70 mg/L in beverages where expressly permitted in this schedule		

The asterisk (*) in Schedule 1 indicates that additives in Schedules 2, 3 and 4 are permitted.

For an explanation and examples of the different food additive classifications in Schedule 1, please refer to the FSANZ user guide to Standard 1.3.1 - Food Additives.

0.1 Preparations of food additives

Additives in Schedule 2 are permitted.

	_		
200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg
210 211 212 213	Benzoic acid and sodium,	1000	mg/kg
210 211 212 213	potassium and calcium benzoates	1000	111 <u>6</u> / K <u>6</u>
216	Propyl p-hydroxybenzoate	2500	mg/kg
210	(propylparaben)	2300	ing/kg
218	Methyl p-hydroxybenzoate	2500	mg/kg
210	(methylparaben)	2300	iiig/ Kg
220 221 222 223	Sulphur dioxide and sodium and	350	mg/kg
224 225 228	potassium sulphites		
304	Ascorbyl palmitate	GMP	
306	Tocopherols concentrate mixed	GMP	
307	Tocopherol, d-alpha-, concentrate	GMP	
308	Synthetic gamma-tocopherol	GMP	
309	Synthetic delta-tocopherol	GMP	
310	Propyl gallate	100	mg/kg
311	Octyl gallate	100	mg/kg
312	Dodecyl gallate	100	mg/kg
319	Tertiary butylhydroquinone	200	mg/kg
320	Butylated hydroxyanisole	200	mg/kg
385	Calcium disodium EDTA	500	mg/kg
	baking compo	unds	
541	Sodium aluminium phosphate	GMP	
	colourings	1	
	Additives in Schedules 3 & 4 are		
	permitted		
-	Ethanol	GMP	
	/m •		

flavourings

Additives in Schedules 3 & 4 are permitted

-	Ethanol Benzyl slashol	GMP 500	malka	In the final food
-	Benzyl alcohol		mg/kg	In the final food
-	Ethyl acetate	GMP		
-	Glycerol diacetate	GMP		
-	Glyceryl monoacetate	GMP		
-	Isopropyl alcohol	1000	mg/kg	In the final food
320	Butylated hydroxyanisole	1000	mg/kg	
1505	Triethyl citrate	GMP		

rennetting enzymes

200 201 202 203	Sorbic acid and sodium, potassium	9000	mg/kg
	and calcium sorbates		
210 211 212 213	Benzoic acid and sodium,	9000	mg/kg
	potassium and calcium benzoates		

1 DAIRY PRODUCTS (excluding butter and butter fats)

1.1 Liquid milk and liquid milk based drinks

1.1.1 Liquid milk (including buttermilk)

Additives in Schedules 2,3 & 4 must not be added to liquid milk (including buttermilk) unless expressly permitted below

1.1.2 UHT goat milk

Additives in Schedule 2 are permitted

1.1.3 Liquid milk products and flavoured liquid milk*

160b	Annatto extracts	10	mg/kg
950	Acesulphame potassium	500	mg/kg
956	Alitame	40	mg/kg
962	Aspartame-acesulphame salt	1100	mg/kg

1.1.4 Liquid milk to which phytosterol esters have been added

401	Sodium alginate	2	g/kg
407	Carrageenan	2	g/kg
412	Guar gum	2	g/kg
471	Mono- and diglycerides of fatty	2	g/kg
	acids		

1.1.5 Liquid milk to which tall oil phytosterols have been added

460	Microcrystalline cellulose	5	g/kg
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1.2 Fermented and rennetted milk products

1.2.1 Fermented milk and rennetted milk

Additives in Schedules 2, 3 & 4 must not be added to fermented milk and rennetted milk

1.2.2 Fermented milk products and rennetted milk products*

160b	Annatto extracts	60	mg/kg
950	Acesulphame potassium	500	mg/kg
956	Alitame	60	mg/kg
962	Aspartame-acesulphame salt	1100	mg/kg

1.3 Condensed milk and evaporated milk*

1.4 Cream and cream products

1.4.1 Cream, reduced cream and light cream)

Additives in Schedules 2, 3 & 4 must not be added to cream, reduced cream and light cream unless expressly permitted below

UHT creams and creams receiving equivalent or greater heat treatments only

Additives in Schedule 2 are permitted

1.4.2	.4.2 Cream products (flavoured, whipped, thickened, sour cream etc.)*				
	234	Nisin	10	mg/kg	
	whipped thickene	d light cream			
	475	Polyglycerol esters of fatty acids	5000	mg/kg	
1.5	Dried milk, milk	powder, cream powder*			
	304	Ascorbyl palmitate	5000	mg/kg	
	320	Butylated hydroxyanisole	100	mg/kg	
	343	Magnesium phosphates	10000	mg/kg	
	431	Polyoxyethylene (40) stearate	GMP		
	530	Magnesium oxide	10000	mg/kg	
	542	Bone phosphate	1000	mg/kg	
	555	Potassium aluminium silicate	GMP		
1.6	Cheese and chees	e products*			
	160b	Annatto extracts	50	mg/kg	
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	3000	mg/kg	
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	300	mg/kg	
	234	Nisin	GMP		
	235	Pimaricin (natamycin)	15	mg/kg	On cheese surfaces, based on individual cheese weight
	251 252	Nitrates (potassium and sodium salts)	50	mg/kg	
	338	Phosphoric acid	GMP		
	555	Potassium aluminium silicate	10000	mg/kg	
	560	Potassium silicate	10000	mg/kg	
2	560				

160b	Annatto extracts	20	mg/kg
304	Ascorbyl palmitate	GMP	
306	Tocopherols concentrate mixed	GMP	
307	Tocopherol, d-alpha-, concentrate	GMP	
308	Synthetic gamma-tocopherol	GMP	
309	Synthetic delta-tocopherol	GMP	
310	Propyl gallate	100	mg/kg
311	Octyl gallate	100	mg/kg
312	Dodecyl gallate	100	mg/kg
319	Tertiary butylhydroquinone	200	mg/kg
320	Butylated hydroxyanisole	200	mg/kg
321	Butylated hydroxytoluene	100	mg/kg

2.1	Edible oils essenti	ally free of water*		
	shortening			
	475 476	Polyglycerol esters of fatty acids Polyglycerol esters of interesterified ricinoleic acids	20000 20000	mg/kg mg/kg
	frying oils			
	900a	Polydimethylsiloxane olive oil	10	mg/kg
		Additives in Schedules 3 and 4 must not be added to olive oil		
2.2	Oil emulsions (wa	ter in oil)		
2.2.1	Oil emulsions (>8	0% oil)		
2.2.1	.1 Butter			
		Additives in Schedules 2, 3 and 4 must not be added to butter unless expressly permitted below		
	160a	Carotenes	GMP	
	160b	Annatto extracts	20 CMD	mg/kg
	160e 160f	Carotenal, b-apo-8'- Carotenal, b-apo-8'-, methyl or	GMP GMP	
	508	ethyl esters Potassium chloride	GMP	
2.2.1	.2Butter products*			
2.2.1	.3 Margarine and si	milar products*		
	475 476	Polyglycerol esters of fatty acids Polyglycerol esters of interesterified ricinoleic acids	5000 5000	mg/kg mg/kg

2.2.2 Oil emulsions (<80% oil)

200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	2000	mg/kg
210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	1000	mg/kg
234	Nisin	GMP	
281	Sodium propionate	GMP	
282	Calcium propionate	GMP	
475	Polyglycerol esters of fatty acids	5000	mg/kg
476	Polyglycerol esters of	5000	mg/kg
	interesterified ricinoleic acids		

ICE CREAM AND EDIBLE ICES* 3

123	Amaranth	290	mg/kg
160b	Annatto extracts	25	mg/kg
950	Acesulphame potassium	1000	mg/kg
956	Alitame	100	mg/kg
962	Aspartame-acesulphame salt	2200	mg/kg

ice confection sold in liquid form

200 201 202 203	Sorbic acid and sodium, potassium	400	mg/kg
	and calcium sorbates		
210 211 212 213	Benzoic acid and sodium,	400	mg/kg
	potassium and calcium benzoates		
220 221 222 223	Sulphur dioxide and sodium and	25	mg/kg
224 225 228	potassium sulphites		

4 FRUITS AND VEGETABLES (including fungi, nuts, seeds, herbs and spices)

4.1 Unprocessed fruits and vegetables

Additives in Schedules 2, 3 & 4 must not be added to unprocessed fruits and vegetables unless expressly permitted below

grapes packed with permeable envelopes220 221 222 223
224 225 228Sulphur dioxide and sodium and
potassium sulphites10mg/kglongans220 221 222 223
224
potassium sulphitesSulphur dioxide and sodium and
potassium sulphites10mg/kg

The Australian Pesticides

Medicines Authority

(APVMA) has issued a maximum residue limit of sulphur dioxide for longans of 500 mg/kg in the whole fruit

and Veterinary

4.1.1 Untreated fruits and vegetables

Additives in Schedules 2, 3 & 4 must not be added to untreated fruits and vegetables

4.1.2 Surface treated fruits and vegetables

	Additives in Schedules 2, 3 & 4 must not be added to surface treated fruits and vegetables unless expressly permitted below		
342	Ammonium phosphates	GMP	
473	Sucrose esters of fatty acids	100	mg/kg
901	Beeswax, white and yellow	GMP	
903	Carnauba wax	GMP	
904	Shellac	GMP	
citrus fruit			
914	Oxidised polyethylene	250	mg/kg
1520	Propylene glycol	30000	mg/kg
walnut and pe	can nut kernels		
304	Ascorbyl palmitate	GMP	
320	Butylated hydroxyanisole	70	mg/kg
321	Butylated hydroxytoluene	70	mg/kg

4.1.3 Peeled and/or cut fruits and vegetables

		Additives in Schedules 2 are permitted			
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	375	mg/kg	
	apples and potato	es for manufacturing purposes			
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	200	mg/kg	
	root and tuber veg	getables			
	220 221 222 223 224 225 228 920	Sulphur dioxide and sodium and potassium sulphites L-cysteine monohydrochloride	50 GMP	mg/kg	
4.2		ed fruits and vegetables	ci.ii		
4.2	riozen unprocess	Additives in Schedules 2, 3 & 4 must not be added to frozen unprocessed fruits and vegetables unless expressly permitted below			Note: additives permitted in category 4.1 may be present in category 4.2 due to carry-over as per Clause 7 of this Standard
	frozen avocado				
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	300	mg/kg	
4.3	Processed fruits a	nd vegetables*			
	processed ginger				
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	20	mg/kg	
	mushrooms in bri	ne or water and not commercially st	erile		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	500	mg/kg	
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	500	mg/kg	
	preserved cherrie	s known as maraschino cherries, coc	ktail che	rries or gla	ce cherries
	127 210 211 212 213	Erythrosine Benzoic acid and sodium, potassium and calcium benzoates	200 1000	mg/kg mg/kg	
	tomato products p	oH < 4.5			
	234	Nisin	GMP		
4.3.1	Dried fruits and v	egetables*			
	200 201 202 203	Sorbic acid and sodium, potassium	1000	mg/kg	
	220 221 222 223 224 225 228	and calcium sorbates Sulphur dioxide and sodium and potassium sulphites	3000	mg/kg	

desiccated coconut

	desiccated coconut	t		
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	50	mg/kg
4.3.2	Fruits and vegetat	oles in vinegar, oil, brine or alcohol*		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	1000	mg/kg
	950	Acesulphame potassium	3000	mg/kg
	956	Alitame	40	mg/kg
	962	Aspartame-acesulphame salt	6800	mg/kg
	products made fro	m bleached vegetables		
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	750	mg/kg
4.3.3	Commercially ster	ile fruits and vegetables in hermetic	ally seal	ed containers*
	950	Acesulphame potassium	500	mg/kg
	952	Cyclamates	1350	mg/kg
	954	Saccharin	110	mg/kg
	962	Aspartame-acesulphame salt	1100	mg/kg
	canned asparagus			
	512	Stannous chloride	100	mg/kg
4.3.4	Fruit and vegetabl	le spreads including jams, chutneys a	and relat	ted products*
	123	Amaranth	290	mg/kg
	281	Sodium propionate	GMP	
	282	Calcium propionate	GMP	
	950	Acesulphame potassium	3000	mg/kg
	952	Cyclamates	1000	mg/kg
	954	Saccharin	1500	mg/kg
	956	Alitame	300	mg/kg
	962	Aspartame-acesulphame salt	6800	mg/kg
	low joule chutneys	s, low joule jams and low joule sprea	ds	
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	1000	mg/kg
	220 221 222 223	Sulphur dioxide and sodium and	285	mg/kg
	224 225 228	potassium sulphites		
4.3.5	Candied fruits and	l vegetables*		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	500	mg/kg
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	2000	mg/kg
4.3.6	Fruit and vegetabl	le preparations including pulp*		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg

	210 211 212 213	Benzoic acid and sodium,	1000	mg/kg
	220 221 222 223	potassium and calcium benzoates Sulphur dioxide and sodium and	350	mg/kg
	224 225 228 234	potassium sulphites Nisin	GMP	
	chilli paste			
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	3000	mg/kg
	fruit and vegetable	e preparations for manufacturing pu	irposes	
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	1000	mg/kg
4.3.7	Fermented fruit a	nd vegetable products*		
	lactic acid ferment	ted fruits and vegetables*		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	500	mg/kg
4.3.8	Other fruit and ve	getable based products*		
4.3.8	Other fruit and ve dried instant mash	-		
4.3.8	dried instant mash 304	ned potato Ascorbyl palmitate	GMP	
4.3.8	dried instant mash	ned potato	GMP 100	mg/kg
4.3.8	dried instant mash 304	ned potato Ascorbyl palmitate		mg/kg
4.3.8	dried instant mash 304 320	hed potato Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium		mg/kg mg/kg
4.3.8	dried instant mask 304 320 imitation fruit	hed potato Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium and calcium sorbates Benzoic acid and sodium,	100	
4.3.8	dried instant mash 304 320 imitation fruit 200 201 202 203	hed potato Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium and calcium sorbates	100 500	mg/kg
4.3.8 5	dried instant mask 304 320 imitation fruit 200 201 202 203 210 211 212 213 220 221 222 223	 Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium and calcium sorbates Benzoic acid and sodium, potassium and calcium benzoates Sulphur dioxide and sodium and potassium sulphites 	100 500 400	mg/kg mg/kg
	dried instant mask 304 320 imitation fruit 200 201 202 203 210 211 212 213 220 221 222 223 224 225 228	 Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium and calcium sorbates Benzoic acid and sodium, potassium and calcium benzoates Sulphur dioxide and sodium and potassium sulphites 	100 500 400	mg/kg mg/kg
	dried instant mask 304 320 imitation fruit 200 201 202 203 210 211 212 213 220 221 222 223 224 225 228 CONFECTI	 Ascorbyl palmitate Butylated hydroxyanisole Sorbic acid and sodium, potassium and calcium sorbates Benzoic acid and sodium, potassium and calcium benzoates Sulphur dioxide and sodium and potassium sulphites 	100 500 400 3000	mg/kg mg/kg mg/kg

123	Amaranth	300	mg/kg
160b	Annatto extracts	25	mg/kg
173	Aluminium	GMP	
174	Silver	GMP	
175	Gold	GMP	
950	Acesulphame potassium	2000	mg/kg
951	Aspartame	10000	mg/kg
955	Sucralose	2500	mg/kg
956	Alitame	300	mg/kg
961	Neotame	300	mg/kg
962	Aspartame-acesulphame salt	4500	mg/kg

fruit filling for confectionery containing not less than 200 g/kg of fruit

200 201 202 203	Sorbic acid and sodium. potassium	500	mg/kg
	and calcium sorbates		

5.1 Chocolate and cocoa products

		Additives in Schedule 2 are permitted			
		Additives in Schedules 3 and 4 are permitted on the surface of chocolate only			
	476	Polyglycerol esters of interesterified ricinoleic acids	5000	mg/kg	
	477	Propylene glycol esters of fatty acids	4000	mg/kg	
5.2	Sugar confectione	ry			
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg	
	bubble gum and c	hewing gum			
	304	Ascorbyl palmitate	GMP		Chewing gum and bubble gum may contain both sugars and intense sweeteners
	310	Propyl gallate	200	mg/kg	
	320	Butylated hydroxyanisole	200	mg/kg	
	321	Butylated hydroxytoluene	200	mg/kg	
	low joule chewing	gum			
	952	Cyclamates	20000	mg/kg	
	954	Saccharin	1500	mg/kg	
5.3	Not assigned				
5.4	Icings and frosting	gs			
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1500	mg/kg	
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	1000	mg/kg	
6	CEREALS A	AND CEREAL PRODUCTS			
6.1	Cereals (whole an	d broken grains)			
		Additions in Saladalar 2.2.8.4			

Additives in Schedules 2,3 & 4 must not be added to cereals (whole and broken grains) unless expressly permitted below

precooked rice		
Ā71	Mono-and diglycerides of fatty	GMP
	acids	

6.2 Flours, meals and starches

Additives in Schedules 2,3 & 4 must not be added to flours, meals and starches Note: flour, meal and starch products (e.g. self raising flour, bakers flour) sold at wholesale or retail for use in the preparation of other foods may contain such additives as are permitted in those foods in accordance with clause 8

6.3 Processed cereal and meal products*

extruded and/or puffed cereals

	160b	Annatto extracts	100	mg/kg	
6.4	Flour products (in	cluding noodles and pasta)*			
	160b	Annatto extracts	25	mg/kg	
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg	
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	300	mg/kg	
	280	Propionic acid	2000	mg/kg	
	281	Sodium propionate	2000	mg/kg	
	282	Calcium propionate	2000	mg/kg	
	283	Potassium propionate	2000	mg/kg	
	950	Acesulphame potassium	200	mg/kg	
	956	Alitame	200	mg/kg	
	962	Aspartame-acesulphame salt	450	mg/kg	
	crumpets, flapjack	and pikelets			
	234	Nisin	250	mg/kg	Flour products that are cooked on hotplates only
7	BREADS AN	ND BAKERY PRODUCTS*			
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1200	mg/kg	
	280	Propionic acid	4000	mg/kg	
	281	Sodium propionate	4000	mg/kg	
	282	Calcium propionate	4000	mg/kg	
	283	Potassium propionate	4000	mg/kg	
7.1	Breads and related	l products			
7.2	Biscuits, cakes and	l pastries			
	160b	Annatto extracts	25	mg/kg	
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	300	mg/kg	
	950	Acesulphame potassium	200	mg/kg	
	956	Alitame	200	mg/kg	
	962 cake	Aspartame-acesulphame salt	450	mg/kg	

475 Polyglycerol esters of fatty acids 15000 mg/kg

8 MEAT AND MEAT PRODUCTS (including poultry and game)

8.1 Raw meat, poultry and game

Additives in Schedules 2,3 & 4
must not be added to raw meat,
poultry and game unless
expressly permitted below

	fresh poultry								
	262	Sodium acetates	5000	mg/kg					
8.2	Processed meat, poultry and game products in whole cuts or pieces*								
	commercially ster	rile canned cured meat							
	249 250	Nitrites (potassium and sodium salts)	50	mg/kg					
	cured meat								
	249 250	Nitrites (potassium and sodium salts)	125	mg/kg					
	dried meat								
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1500	mg/kg					
	249 250	Nitrites (potassium and sodium salts)	125	mg/kg					
	slow dried cured	meat							
	249 250	Nitrites (potassium and sodium salts)	125	mg/kg					
	251 252	Nitrates (potassium and sodium salts)	500	mg/kg					
8.3	Processed commi	nuted meat, poultry and game produ	cts*						
	160b	Annatto extracts	100	mg/kg					
	220 221 222 223	Sulphur dioxide and sodium and	500	mg/kg					
	224 225 228 249 250	potassium sulphites Nitrites (potassium and sodium salts)	125	mg/kg					
	fermented, uncoo	ked processed comminuted meat pro	ducts						
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1500	mg/kg					
	235	Pimaricin (natamycin)	1.2	mg/dm ²	When determined in a surface sample taken to a depth of not less than 3 mm and not more than 5 mm including the casing, applied to the surface of food.				
	251 252	Nitrates (potassium and sodium salts)	500	mg/kg					
	sausage and sausa	age meat containing raw, unprocessed	d meat						

		Additives must not be added to sausage and sausage meat containing raw, unprocessed meat, unless expressly permitted below		
		Additives in Schedule 2 are permitted		
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	500	mg/kg
8.4	Edible casings*			
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	100	mg/kg
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	500	mg/kg

8.5 Animal protein products*

9 FISH AND FISH PRODUCTS

9.1 Unprocessed fish and fish fillets (including frozen and thawed)

Additives in Schedules 2,3&4 must not be present in unprocessed fish and fish fillets (including frozen and thawed) unless expressly permitted below

frozen fish

300 301 302 303	Ascorbic acid and sodium, calcium and potassium ascorbates	400	mg/kg	Fish as defined in Standard 2.2.3 includes crustacea and molluscs
315 316	Erythorbic acid and sodium erythorbate	400	mg/kg	
339 340 341	Sodium, potassium and calcium phosphates	GMP		
450	Pyrophosphates	GMP		
451	Triphosphates	GMP		
452	Polyphosphates	GMP		
uncooked crustac	ea			
220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	100	mg/kg	Uncooked crustacea may include frozen and thawed products
	1	100 GMP	mg/kg	
224 225 228	potassium sulphites Ascorbic acid and sodium, calcium		mg/kg	may include frozen
224 225 228 300 301 302 303	potassium sulphites Ascorbic acid and sodium, calcium and potassium ascorbates Erythorbic acid and sodium	GMP	mg/kg	may include frozen
224 225 228 300 301 302 303 315 316 330 331 332 333	potassium sulphites Ascorbic acid and sodium, calcium and potassium ascorbates Erythorbic acid and sodium erythorbate Citric acid and sodium, potassium,	GMP GMP	mg/kg	may include frozen
224 225 228 300 301 302 303 315 316 330 331 332 333 380	potassium sulphites Ascorbic acid and sodium, calcium and potassium ascorbates Erythorbic acid and sodium erythorbate Citric acid and sodium, potassium, calcium and ammonium citrates Sodium carbonates	GMP GMP GMP	mg/kg	may include frozen
224 225 228 300 301 302 303 315 316 330 331 332 333 380 500	potassium sulphites Ascorbic acid and sodium, calcium and potassium ascorbates Erythorbic acid and sodium erythorbate Citric acid and sodium, potassium, calcium and ammonium citrates	GMP GMP GMP GMP	mg/kg	may include frozen

9.2 Processed fish and fish products*

	cooked crustacea				
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	30	mg/kg	
	roe				
	123	Amaranth	300	mg/kg	
9.3	Semi preserved fis	sh and fish products*			
	160b 200 201 202 203	Annatto extracts Sorbic acid and sodium, potassium and calcium sorbates	10 2500	mg/kg mg/kg	
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	2500	mg/kg	
	roe				
	123	Amaranth	300	mg/kg	
9.4	Fully preserved fig	sh including canned fish products*			
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	30	mg/kg	
	385	Calcium disodium EDTA	250	mg/kg	
	canned abalone (p	aua)			
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	1000	mg/kg	
	roe				
	123	Amaranth	300	mg/kg	
10	EGGS AND	EGG PRODUCTS			
10.1	Eggs				
		Additives in Schedules 2,3 & 4 must not be added to eggs			
10.2	Liquid egg produc	ets			
		Additives in Schedule 2 are permitted			
	234 1505	Nisin Triethyl citrate	GMP 1250	mg/kg	Liquid white only
10.3	Frozen egg produe	cts			
		Additives in Schedule 2 are permitted			
10.4	Dried and/or heat	coagulated egg products			
		Additives in Schedule 2 are permitted			

11 SUGARS, HONEY AND RELATED PRODUCTS

11.1 Sugar

		Additives in Schedules 2,3 & 4 must not be added to sugar unless expressly permitted below		
	460	Cellulose, microcrystalline and powdered	GMP	
	rainbow sugar*			
11.2	Sugars and syrups	5		
		Additives in Schedules 2,3 & 4 must not be added to sugars and syrups unless expressly permitted below		
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	450	mg/kg

11.3 Honey and related products

Additives in Schedules 2,3 & 4 must not be added to honey and related products unless expressly permitted below

11.3.1 Dried honey

Additives in Schedule 2 are permitted

11.4. Tabletop sweeteners*

636	Maltol	GMP
637	Ethyl maltol	GMP
640	Glycine	GMP
641	L-Leucine	GMP
950	Acesulphame potassium	GMP
956	Alitame	GMP
962	Aspartame-acesulphame salt	GMP
1201	Polyvinylpyrrolidone	GMP

11.4.1 Tabletop sweeteners – liquid preparation*

200 201 202 203	Sorbic acid and sodium, potassium	GMP
	and calcium sorbates	
210 211 212 213	Benzoic acid and sodium,	GMP
	potassium and calcium benzoates	
954	Saccharin	GMP

11.4.2 Tabletop sweeteners - tablets or powder or granules packed in portion sized packages*

954

Saccharin

GMP

12 SALTS AND CONDIMENTS

12.1 Salt and salt substitutes

12.1.1 Salt

Additives in Schedules 2,3 & 4 must not be added to salt unless expressly permitted below

341 381 504 535 536 551 552 554	Calcium phosphates Ferric ammonium citrate Magnesium carbonates Sodium ferrocyanide Potassium ferrocyanide Silicon dioxide (amorphous) Calcium silicate Sodium aluminosilicate	GMP GMP 50 50 GMP GMP GMP	mg/kg mg/kg	 total of sodium and potassium ferrocyanide
556	Calcium aluminium silicate	GMP		
220				

12.1.2 Reduced sodium salt mixture *

12.1.3 Salt substitute*

359	Ammonium adipate	GMP
363	Succinic acid	GMP
1001	Choline salts of acetic, carbonic, hydrochloric, citric, tartaric and lactic acid	GMP

12.2 not assigned

12.3 Vinegars and related products

Additives in Schedule 3 are permitted

220 221 222 223	Sulphur dioxide and sodium and	100	mg/kg
224 225 228	potassium sulphites		
300 301 302 303	Ascorbic acid and sodium, calcium	100	mg/kg
	and potassium ascorbates		
315 316	Erythorbic acid and sodium erythorbate	100	mg/kg
-	Flavourings, excluding quinine and caffeine		

12.4 not assigned

12.5 Yeast and yeast products

Additives in Schedules 2 and 3 are permitted

12.6 Vegetable protein products

Additives in Schedules 2 and 3 are permitted

13 FOODS INTENDED FOR PARTICULAR DIETARY USES

13.1 Infant formula products

Additives in Schedules 2,3 & 4 must not be added to infant formula products unless expressly permitted below				
270	Lactic acid	GMP		
304	Ascorbyl palmitate	10	mg/L	
306	Tocopherols concentrate mixed	10	mg/L	

	322	Lecithin	5000	mg/L		
	330	Citric acid	GMP	U		
	331	Sodium citrate	GMP			
	332	Potassium citrate	GMP			
	410	Locust bean (carob bean) gum	1000	mg/L		
	412	Guar gum	1000	mg/L		
	471	Mono- and diglycerides of fatty	4000	mg/L		
	4/1	acids	4000	ш _б / Ц		
	526	Calcium hydroxide	GMP			
	520	Calcium nyuloxide	OWI			
	soy-based infant fo	ormula				
	•			-		
	1412	Distarch phosphate	5000	mg/L		
	1413	Phosphated distarch phosphate	5000	mg/L		Clause 6 applies
	1414	Acetylated distarch phosphate	5000	mg/L		mg/L in total
	1440	Hydroxypropyl starch	25000	mg/L		
	liquid infant form	ula products				
	407	Carrageenan	300	mg/L		
	407	Carrageenan	500	iiig/L		
	infant formula pro	oducts for specific dietary use based o	on prote	in subst	itutes	
	407	Carrageenan	1000	mg/L		
	471	Mono- and diglycerides of fatty	5000	mg/L		
		acids				
	472c	Citric and fatty acid esters of	9000	mg/L		
		glycerol				
	472e	Diacetyltartaric and fatty acid esters of glycerol	400	mg/L		
	1412	Distarch phosphate	25000	mg/L		
	1413	Phosphated distarch phosphate	25000	mg/L		Clause 6 applies
	1414	Acetylated distarch phosphate	25000	mg/L		mg/L in total
	1440	Hydroxypropyl starch	25000	mg/L		
13.2	Foods for infants	5 51 15		U U		
		Additives in Schedules 2,3 & 4 must not be added to foods for infants unless expressly permitted below				
	-	Flavourings, excluding quinine and	GMP			
		caffeine				
	170i	Calcium carbonate	GMP			
	260 261 262 263	Acetic acid and its potassium,	5000	mg/kg		
	264	sodium, calcium and ammonium				
		salts				
	270 325 326 327	Lactic acid and its sodium,	2000	mg/kg		
	328	potassium, calcium and				
		ammonium salts				
	300 301 302 303	Ascorbic acid and its sodium,	500	mg/kg		
		calcium and potassium salts	100			
	304	Ascorbyl palmitate	100	mg/kg		
	306	Tocopherols, concentrate mixed	300	mg/kg		Clause 6 applies
	307	Tocopherols, d-alpha-, concentrate	300	mg/kg		mg/kg fat in total
	322	Lecithin	15000	mg/kg		
	330 331 332 333	Citric acid and sodium, potassium,	GMP			
	380	calcium and ammonium citrates				
	407	Carrageenan	10000	mg/kg		
	410	Locust bean (carob bean) gum	10000	mg/kg		
	412	Guar gum	10000	mg/kg		
		-				

	414	Gum arabic (Acacia)	10	mg/kg	
	415	Xanthan gum	10000	mg/kg	
	440	Pectin	10000	mg/kg	
	471	Mono- and diglycerides of fatty	5000	mg/kg	
	7/1	acids	5000	ing ng	
	500	Sodium carbonates	GMP		
	501	Potassium carbonates	GMP		
	503	Ammonium carbonates	GMP		
	509	Calcium chloride	750	mg/kg	
	1412	Distarch phosphate	50000	mg/kg	
	1413	Phosphated distarch phosphate	50000	mg/kg	Clause 6 applies mg/kg in
	1414	Acetylated distarch phosphate	50000	mg/kg	total
	1422	Acetylated distarch adipate	50000	mg/kg	
	1440	Hydroxypropyl starch	50000	mg/kg	
13.3	Formula meal rep	lacements and formulated supplement	ntary foo	ods*	-
	950	Acesulphame potassium	500	mg/kg	
	956	Alitame	85	mg/kg	
	962	Aspartame-acesulphame salt	1100	mg/kg	
13.4	Formulated suppl	ementary sports foods*			
13.4			300	malka	
	123 160b	Amaranth Annatto extracts	100	mg/kg mg/kg	
	1000	Annatio extracts	100	mg/kg	
	210 211 212	Benzoic acid and sodium,	400	mg/kg	
	213	potassium and calcium benzoates			
	220 221 222 223	Sulphur dioxide and sodium and	115	mg/kg	
	224 225 228	potassium sulphites			
	950	Acesulphame potassium	500	mg/kg	
	956	Alitame	40	mg/kg	
	962	Aspartame-acesulphame salt	1100	mg/kg	
13.4.1	l Solid formulated s	supplementary sports foods*			
	280	Propionic acid	400	mg/kg	
	281	Sodium propionate	400	mg/kg	
	282	Calcium propionate	400	mg/kg	
13.4.2	2 Liquid formulated	l supplementary sports foods*			
	200 201 202 203	Sorbic acid and sodium, potassium	400	mg/kg	
		and calcium sorbates			
14	NON-ALCO	HOLIC AND ALCOHOLIC I	BEVER	AGES	
14.1	Non-alcoholic bev	erades			
		ci uguo			
14.1.1	l Waters				

14.1.1.1 Mineral water

	Additives in Schedules 2,3 & 4 must not be added to mineral water unless expressly permite below	ted
290	Carbon dioxide	GMP

14.1.1.2 Carbonated, mineralised and soda waters*

14.1.2 Fruit and vegetable juices and fruit and vegetable juice products

200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	400	mg/kg	May include pasteurised or commercially sterile
210 211 212 213	Benzoic acid and sodium,	400	mg/kg	products.
	potassium and calcium benzoates			GMP principle precludes
220 221 222 223	Sulphur dioxide and sodium and	115	mg/kg	the use of preservatives in juices represented as
224 225 228	potassium sulphites			not preserved by chemical or heat
0.40		250	···· - /1	treatment.
242	Dimethyl dicarbonate	250	mg/kg	
281	Sodium propionate	GMP		
282	Calcium propionate	GMP		

14.1.2.1 Fruit and vegetable juices

Additives in Schedules 2,3 & 4 must not be added to fruit and vegetable juices unless expressly permitted below

270	Lactic acid	GMP
290	Carbon dioxide	GMP
296	Malic acid	GMP
330	Citric acid	GMP
334 335 336 337	Tartaric acid and sodium,	GMP
353 354	potassium and calcium tartrates	

coconut milk coconut cream and coconut syrup

200 201 202 203	Sorbic acid and sodium, potassium	1000	mg/kg
	and calcium sorbates		
210 211 212 213	Benzoic acid and sodium,	1000	mg/kg
	potassium and calcium benzoates		

tomato juices pH < 4.5

2	234	Nisin	GMP

14.1.2.2 Fruit and vegetable juice products*

123 160b 950 956 962 fruit drink	Amaranth Annatto extracts Acesulphame potassium Alitame Aspartame-acesulphame salt	30 10 500 40 1100	mg/kg mg/kg mg/kg mg/kg mg/kg
444 445 480 carbonated f	Sucrose acetate isobutyrate Glycerol esters of wood rosins Dioctyl sodium sulphosuccinate ruit drinks	200 100 10	mg/kg mg/kg mg/kg
385	Calcium disodium EDTA	33	mg/kg

low joule fruit and vegetable products

Applies to fruit and vegetable juices separated by mechanical means only. Carry- over of additives from concentrates and fruit and vegetable juice products is not permitted.

950	Acesulphame potassium	3000	mg/kg	
952	Cyclamates	400	mg/kg	
954	Saccharin	80	mg/kg	
962	Aspartame-acesulphame salt	6800	mg/kg	
14.1.3 Water based flav	voured drinks*			
123	Amaranth	30	mg/kg	
200 201 202 203	Sorbic acid and sodium, potassium	400	mg/kg	
	and calcium sorbates			
210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	400	mg/kg	
220 221 222 223	Sulphur dioxide and sodium and	115	mg/kg	
224 225 228	potassium sulphites	250	л	
242	Dimethyl dicarbonate	250 33	mg/kg	Products containing fruit
385	Calcium disodium EDTA	33	mg/kg	flavouring, juice or pulp or orange peel extract only
444	Sucrose acetate isobutyrate	200	mg/kg	
445	Glycerol esters of wood rosins	100	mg/kg	
480	Dioctyl sodium sulphosuccinate	10	mg/kg	
950	Acesulphame potassium	3000	mg/kg	
952	Cyclamates	600	mg/kg	
954	Saccharin	150	mg/kg	
956	Alitame	40	mg/kg	
962	Aspartame-acesulphame salt	6800	mg/kg	
tonic drinks, bitt	er drinks and quinine drinks			
-	Quinine	100		
electrolyte drink	and electrolyte drink base			
-	-			
950	Acesulphame potassium	150	mg/kg	
951	Aspartame	150	mg/kg	
962	Aspartame-acesulphame salt	230	mg/kg	
kola type drinks				
-	Caffeine	145	mg/kg	
338	Phosphoric acid	570	mg/kg	
4.1.3.1 Brewed so	oft drink*			
950	Acesulphame potassium	1000	mg/kg	
950	Aspartame	1000	mg/kg	
952	Cyclamates	400	mg/kg	Brewed soft drinks may
954	Saccharin		mg/kg	contain sugars and
955	Sucralose	250	mg/kg	intense sweeteners
956	Alitame	40	mg/kg	
950 957	Thaumatin	GMP	ing, ng	
962	Aspartame-acesulphame salt	1500	mg/kg	
14.1.4 Formulated Bev	erages*			
	-	20	malka	
123 160b	Amaranth Appetto extracts	30	mg/kg mg/kg	Products containing fruit
160b	Annatto extracts	10	mg/kg	or vegetable juice only
200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	400	mg/kg	
210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	400	mg/kg	

220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	115	mg/kg	
242	Dimethyl dicarbonate	250	mg/kg	
281	Sodium propionate	GMP		Products containing fruit
282	Calcium propionate	GMP		or vegetable juice only
385	Calcium disodium EDTA	33	mg/kg	Products containing fruit flavouring, juice or pulp or orange peel extract only
444	Sucrose acetate isobutyrate	200	mg/kg	
445	Glycerol esters of wood rosins	100	mg/kg	
480	Dioctyl sodium sulphosuccinate	10	mg/kg	
950	Acesulphame potassium	3000	mg/kg	
951	Aspartame	GMP		
954	Saccharin	150	mg/kg	Formulated beverages
955	Sucralose	GMP		may contain sugars and intense sweeteners
956	Alitame	40	mg/kg	
957	Thaumatin	GMP		
961	Neotame	GMP		
962	Aspartame-acesulphame salt	6800	mg/kg	

14.1.5 Coffee, coffee substitutes, tea, herbal infusions and similar products

Additives in Schedule 2 are permitted

950	Acesulphame potassium	500	mg/kg
962	Aspartame-acesulphame salt	1100	mg/kg

14.2 Alcoholic beverages (including no and low alcohol)

14.2.1 Beer and related products

	Additives in Schedules 2,3 & 4 must not be added to beer and related products unless expressly permitted below		
-	Flavourings, excluding quinine and caffeine	GMP	
150a	Caramel I	GMP	
150b	Caramel II – caustic sulphite process	GMP	
150c	Caramel III – ammonia process	GMP	
150d	Caramel IV – ammonia sulphite process	GMP	
220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	25	mg/kg
234	Nisin	GMP	
290	Carbon dioxide	GMP	
300 301 302 303	Ascorbic acid and sodium, calcium and potassium ascorbates	GMP	
315 316	Erythorbic acid and sodium erythorbate	GMP	
405	Propylene glycol alginate	GMP	
941	Nitrogen	GMP	

14.2.2 Wine, sparkling wine and fortified wine

	Additives	in Schedules 2,3 & 4			
		ot be added to wine,			
		ng wine and fortified wi	no		
		expressly permitted belo			
150a	Caramel		w GMP		
150a 150b			GMP		
1300		II – caustic sulphite	OMI		
150	process		GMP		
150c		III – ammonia process	GMP		
150d	process	IV – ammonia sulphite	GMP		
163ii	1	in extract	GMP		
170	-	carbonates	GMP		
181	Tannins		GMP		
200 201 20	02 203 Sorbic ac	id and sodium, potassiur cium sorbates	n 200	mg/kg	
242		dicarbonate	200	mg/kg	
270	Lactic ac		GMP	00	
290	Carbon d		GMP		
296	Malic aci		GMP		
297	Fumaric		GMP		
300	Ascorbic		GMP		
301	Sodium a		GMP		
302		ascorbate	GMP		
315	Erythorb		GMP		
316		erythorbate	GMP		
330	Citric aci	2	GMP		
334	Tartaric a		GMP		
336	Potassiur		GMP		
337		n sodium tartrate	GMP		
341		phosphates	GMP		
342		um phosphates	GMP		
353	Metatarta		GMP		
414	Gum aral		GMP		
431		ethylene (40) stearate	GMP		
491		monostearate	GMP		
500		carbonates	GMP		
501		n carbonates	GMP		
501	rotassiui	il carbonates	OMI		
636	Maltol		250	mg/kg	Wine made with other
637	Ethyl ma	ltol	100	mg/kg	than Vitis vinifera
	·				grapes only
wine, spa	rkling wine and for	rtified wine containing	greater than	35 g/L resid	ual sugar
220 221 22	22 223 Sulphur o	lioxide and sodium and	400	mg/kg	
224 225 22	-	um sulphites		0.0	
wing sna	rkling wine and for	rtified wine containing	loss than 35 d	n/I residual	sugar
· •	8	C		5	Sugar
220 221 22 224 225 22		lioxide and sodium and um sulphites	250	mg/kg	
14.2.3 Wine bas	ed drinks and redu	ced alcohol wines*			
_	Quinine		300	mg/kg	
123	Amarant	h	30	mg/kg	
160b	Annatto		10	mg/kg	
175	Gold		100	mg/kg	
175	Colu		100	8	

14.2.4 Fruit wine, vegetable wine and mead (including cider and perry)

		Additives in Schedules 2,3 & 4 must not be added to fruit wine, vegetable wine and mead		
		(including cider and perry) unless expressly permitted below		
	150a	Caramel I – plain	1000	mg/kg
	150b	Caramel II – caustic sulphite process	1000	mg/kg
	150c	Caramel III – ammonia process	1000	mg/kg
	150d	Caramel IV – ammonia sulphite process	1000	mg/kg
	170i	Calcium carbonates	GMP	
	181 200 201 202 203	Tannins Sorbic acid and sodium, potassium	GMP 400	mg/kg
	210 211 212 213	and calcium sorbates Benzoic acid and sodium, potassium and calcium benzoates	400	mg/kg
	242	Dimethyl dicarbonate	200	mg/kg
	260	Acetic acid, glacial	GMP	
	270	Lactic acid	GMP	
	290	Carbon dioxide	GMP	
	296	Malic acid	GMP	
	297	Fumaric acid	GMP	
	300	Ascorbic acid	GMP	
	315	Erythorbic acid	GMP	
	330	Citric acid	GMP	
	334	Tartaric acid	GMP	
	336	Potassium tartrate	GMP	
	341	Calcium phosphates	GMP	
	342	Ammonium phosphates	GMP	
	353	Metatartaric acid	GMP	
	491	Sorbitan monostearate	GMP	
	500	Sodium carbonates	GMP	
	501	Potassium carbonates	GMP	
	503	Ammonium carbonates	GMP	
	516	Calcium sulphate	GMP	
	fruit wine, vegetab	le wine and mead containing greate	r than 5	g/L residual sugar
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	300	mg/kg
	fruit wine, vegetab	le wine and mead containing less th	an 5 g/L	residual sugar
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	200	mg/kg
14.2.4	4.1 Fruit and v	egetable wine products*		
14.2.5	5 Spirits and liqueur	rs*		
	123	Amaranth	30	mg/kg
	160b	Annatto extracts	10	mg/kg
	173	Aluminium	GMP	
	174	Silver	GMP	
	175	Gold		
14.3	Alcoholic beverage	es not included in item 14.2*		
	_	Quinine	300	mg/kg
	160b	Annatto extracts	10	mg/kg

200 201 202 203	Sorbic acid and sodium, potassium	400	mg/kg
210 211 212 213	and calcium sorbates Benzoic acid and sodium,	400	mg/kg
210 211 212 213	potassium and calcium benzoates		
220 221 222 223	Sulphur dioxide and sodium and	250	mg/kg
224 225 228 342	potassium sulphites Ammonium phosphates	GMP	

20 MIXED FOODS*

20.1	Beverages			
	160b	Annatto extracts	10	mg/kg
20.2	Food other than b	everages		
	160b	Annatto extracts	25	mg/kg
	custard mix, custa	rd powder and blanc mange powder		
	950	Acesulphame potassium	500	mg/kg
	956	Alitame	100	mg/kg
	962	Aspartame-acesulphame salt	1100	mg/kg
	jelly			
	123	Amaranth	300	mg/kg
	950	Acesulphame potassium	500	mg/kg
	956	Alitame	100	mg/kg
	952	Cyclamates	1600	mg/kg
	954	Saccharin	160	mg/kg
	962	Aspartame-acesulphame salt	1100	mg/kg
	dairy and fat base	d desserts, dips and snacks		
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	500	mg/kg
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	700	mg/kg
	234	Nisin	GMP	
	475	Polyglycerol esters of fatty acids	5000	mg/kg
	476	Polyglycerol esters of interesterified ricinoleic acids	5000	mg/kg
	950	Acesulphame potassium	500	mg/kg
	956	Alitame	100	mg/kg
	962	Aspartame-acesulphame salt	1100	mg/kg
	sauces and topping	gs (including mayonnaises and salad	dressing	(s)
	200 201 202 203	Sorbic acid and sodium, potassium and calcium sorbates	1000	mg/kg
	210 211 212 213	Benzoic acid and sodium, potassium and calcium benzoates	1000	mg/kg
	220 221 222 223 224 225 228	Sulphur dioxide and sodium and potassium sulphites	350	mg/kg
	234	Nisin	GMP	
	281	Sodium propionate	GMP	
	282	Calcium propionate	GMP	
	385	Calcium disodium EDTA	75	mg/kg
	444	Sucrose acetate isobutyrate	200	mg/kg
	445	Glycerol esters of wood rosins	100	mg/kg

475 480 950 952 954 956	Polyglycerol esters of fatty acids Dioctyl sodium sulphosuccinate Acesulphame potassium Cyclamates Saccharin Alitame	20000 50 3000 1000 1500 300	mg/kg mg/kg mg/kg mg/kg mg/kg
		300	00
962	Aspartame-acesulphame salt	6800	mg/kg

soup bases (made up as directed)

950	Acesulphame potassium	3000	mg/kg
954	Saccharin	1500	mg/kg
956	Alitame	40	mg/kg
962	Aspartame-acesulphame salt	6800	mg/kg

Summary of Public Submissions on the Draft Assessment Report

Submitter organisation	Name
Sanitarium Health Food Company	Sharon Saide
Australian Quarantine and Inspection Service	Julie Goodchap
New Zealand Food Safety Authority	Carole Inkster
NSW Food Authority	David Cusack
Queensland Health	Tenille Fort
Food Technology Association of Victoria Inc	David Gill
Department of Human Services Victoria	Victor Di Paola
New Zealand Juice & Beverage Association (other correspondence)	John Robertson
Australian Food and Grocery Council	Kim Leighton

Submitter	Comment
Sanitarium Health Food Company	 Supports option 2 to amend Schedule 1 and other relevant clauses of Standard 1.3.1, and makes the following additional comments: Supports the removal of the asterisk. Supports the proposed amendments to support limits through
	 hierarchies Supports review and amendment of qualification column No further comment on clause 7 The meaning of clause 8 is clear
	 The meaning of clause 8 is clear. Recommends clarifying the editorial note to reflect current industry use of intense sweeteners. Some intense sweeteners may be used to replace some of the sugar previously added to foods, such as breakfast cereal, with no promotion of the product being low or reduced joule or containing no added sugar. Supports the proposed amendment to separate the last paragraph of the editorial note from the earlier information, as it does not relate to intense sweeteners. No further comment on sulphur dioxide limits; Agrees with correcting other anomalies in Schedule 1.
Department of Agriculture, Fisheries and Forestry, Australian Quarantine and Inspection Service	 Supports option 2 with the following specific comments: In section 1.4.1, the word 'only is suggested for deletion; In section 4.2, it is suggested that the qualification be removed
	 as it applies to other foods; In section 14.1.3, the units for quinine are missing; Some formatting inconsistencies were noted in relation to spacing (6.3 and 6.4) and indents (processed ginger, canned asparagus).

Submitter	Comment
New Zealand Food Safety Authority	Supports option 2 to amend Schedule 1 and other relevant clauses of Standard 1.3.1, and accepts that consideration of extending additive carryover provisions to permitted nutritional substances and processing aids is beyond the scope of this review. NZFSA makes the following comments:
	 Supports the inclusion of the proposed diagram and explanation as an editorial note; Suggests consideration of an index to assist users in locating a subcategory within the Schedule; Suggests that if the asterisk is retained then a footnote explaining its meaning should be printed on each page, as in the current standard; Supports the removal of inconsistencies in various Schedule 1 food categories by permitting the broader range of sulphites where there is at present only a reference to sulphur dioxide; Agrees that the formatting can be improved and has offered some suggestions, including: delete 'only' after the words 'greater heat treatments'; Realign 'olive oil' and Change heading to 'Oil emulsions (greater than or equal to 80% oil)'; Realign 'processed ginger'; Reduce font size of Benzoate etc; Insert units for 'Quinine 100' and reduce font size of '951 Aspartame'; Expand brackets to cover all sweeteners re qualification note; Insert level and units for '175 Gold'; remove unnecessary asterisks from certain subcategories.
NSW Food Authority	Supports option 2 to progress this Proposal to Final Assessment, but suggests FSANZ to consider initiating a review of the base clauses of Standard 1.3.1 to ensure that the intent and link between these clauses and the Schedules is clear. Makes the following comments:
	 has significant concerns over the provisions relating to fruit juice prepared from concentrate; With regard to clause 4, the editorial note amendments are supported in general but further clarity would assist; Notes that the guideline was published in 2001 and is due for review; suggests that a reference to the definition of 'intense sweetener' in Schedule 5 be included in clause 4; current wording of clause 4 may be interpreted as a general permission to use intense sweeteners as flavour enhancers or as sugar substitutes in foods; not clear that clause 4 is intended to be a qualifier of permissions in Schedule 1; no clear rationale for a reference to reduced joule foods in the editorial note to clause 4; reference to Code of Practice on Nutrient Claims within the editorial note to clause 4 is not effective for its stated purpose and not possible for use in enforcement action; a number of inconsistencies, anomalies and suggestions were identified in Schedule 1.

Submitter	Comment
Queensland Health	Generally supportive of the proposals outlined in the Draft Assessment Report and supports Option 2.
	Queensland Health Scientific Services have commented on part 8 of Schedule 1 (meat and meat products) that:
	When nitrites are added to these products, some will convert to nitrate so that it is possible that even if excess nitrite was added originally, by the time the food is analysed the nitrite concentration may have fallen below the limit. However, under the existing standard it is still possible to take action for excess nitrite addition by measuring the nitrate as well as the nitrite and calculating back to original total nitrite by invoking the 'qualification'. Under the proposed new standard, this will not be specifically allowed for and it may be necessary for the analyst to argue the case without relying on the Code. Nevertheless, overall part 8 is improved by putting the general calculation rule for nitrates and nitrites with the other such rules in subclause (5)(2), and by removing the illogical 'qualification' for nitrates and nitrites in slow dried cured meats.
Food Technology Association of Victoria Inc	The Committee accepted Option $2 - $ to amend Schedule 1 and other relevant clauses of Standard 1.3.1 to assist with the practical use and interpretation. The following comments were made:
	 Many categories mentioned in the Schedule are not defined in any place in the Code i.e. mixed foods, semi-preserved fish, etc; The order used in the Schedule neither makes any sense nor is this order related to any part of the Code, making it difficult to find the category of food. It is suggested that a table of contents be added at the beginning of the Schedule or the categories be numbered and placed in the same order as elsewhere in the Code.
	 In section 13.1 – Infant Formula Products, some additives are in 'mg/kg' and others are 'mg/L'. This appears inconsistent. Re item 6.4 it is suggested that 'drop scones' be added to 'crumpets, flapjacks and pikelets';
	• Also in item 6.4, why are these products 'that are cooked on hotplates only' permitted to contain Nisin (INS 234) whereas crumpets labelled as being suitable for use in a toaster are not permitted to contain Nisin?
	• In item 14.2.2, Maltol (INS 636) and Ethyl Maltol (INS 637), is there an established analytical test available to enforce this permission?

Submitter	Comment
Department of Human	Supports this Proposal but believes that it does not go far enough
Services Victoria	and suggests the following issues for review:
	 There are definitions of foods that do not exist in Chapter 2 of the Code that exist in Standard 1.3.1, which are legacies of Volume 1 of the Code. There are no ways of cross-referencing additive permissions in Standard 1.3.1 with Chapter 2 of the Code; Part of the review should also incorporate Standard 1.1.2 – Supplementary Definitions for Foods into Chapter 2 and at the same time address the issue of definitional standards throughout the Code to provide uniformity; Of the view that this Proposal is symptomatic of broader issues regarding the ease of use of the Code and the inability of its current structure to enable cross-referencing; Does not object to this Standard progressing to the next stage, however requests that these issues be incorporated in the
	Proposal.
New Zealand Juice & Beverage Association in other correspondence	Stated that the proposed draft variation restricted the use of Schedule 2, 3 and 4 additives in juices.
Australian Food and Grocery Council	Supports the Proposal and supports the need for the underlying principles used in establishing functional classes of food additives based on those set out in the preamble to the draft Codex General Standard for Food Additives (GSFA). Supports the recommendations to:
	 insert a diagram explaining hierarchical permissions; clarify permissions in the qualifications column; split the editorial note to clause 4 to clarify which provisions apply to intense sweeteners; permit the addition of all the permitted sulphites to the categories for formulated supplementary sports foods; and correct anomalies and clarify ambiguities including the editorial note regarding longans.
	Notes that there are consequential impacts of some of the proposed changes and the proposed amended drafting of the Standard and Schedules needs to be carefully checked for illogical or unenforceable provisions, including, for example:
	 under provision 1.1.1 of Schedule 1, the wording under provision 1.1.1 be amended to read 'Additives in Schedules 2, 3 & 4 must not be added to liquid milk, including buttermilk'; provision 7.1 is entirely blank and should either be deleted or relabelled as 'not assigned' as per other blank provisions; the explanatory statement added to provision 9.1 should be moved up to the top of the section to cover the whole section; the additional explanatory note to 14.1.2, Fruit and Vegetable juices and fruit and vegetable products be deleted as it is redundant;

Submitter	Comment
Australian Food and Grocery Council (cont.)	 recommends the qualifying statement in relation to carry-over of additives from concentrates in 14.1.2.1 be deleted as it is unrealistic and a significant change to current permissions; recommends the deletion of the square brackets in provision 14.1.3.1 for brewed soft drinks as it is confusing and unnecessary.