

20 September 2013

Food Standards Australia New Zealand

PO Box 7186

CANBERRA BC ACT 2610

Via email: submissions@foodstandards.gov.au

Dear Food Standards Australia New Zealand,

Submission – Code Revision P1025

The Australian Beverages Council (the Beverages Council) is the peak body representing the \$7 billion non-alcoholic beverage industry. The Beverages Council provides a single, united industry voice to a range of stakeholders including government, non-government organisations, media and general public.

Membership of the Beverages Council comprises over 95% of the non-alcoholic industry's production volume, and is comprised of multi-national companies and small and medium businesses. The Beverages Council has two dedicated category divisions – Fruit Juice Australia and the Australasian Bottled Water Institute, which represent the unique interests of members manufacturing juice and bottled water products respectively.

It is understood that the purpose of the proposal is to revise the *Australia New Zealand Food Standards Code* to improve legal efficacy and for related purposes.

The Australian Beverages Council is concerned that the precise of the Standards Code revision does not address the points made by the OLDP audit, nor jurisdictions, however our membership acknowledges the proposed changes will provide increased opportunity for enforcement.

Unfortunately, drafting is not currently sufficient to enable a complete review to be made.

Correspondence with Peter May on the 5 July 2013 indicated that the material being reviewed was dated, as to amendment 137 dated November 2012. As a consequence, many variations in terms of final figures did not represent that of the present code.

Other challenges in general terms that were encountered in our review:

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1. Revisions did not offer improved clarity beyond that of the current version in many cases.
2. There is concern amongst our working group that the drafting seems loose. Problems have been identified in our review in relation to mechanics of the code.
3. The tendency for definitions to be incompletely addressed in the first instance, then incorporated into the text subsequently was undesirable and impaired readability. Our submission provides specific input on where we found areas of concern.
4. Whilst a twelve month transition is provided, it is noted that much training and retraining will be required to adopt the revision. It is of concern that no structured program for training of regulatory officers is in place. As the Nutricia case demonstrated, programs to address the large and unwieldy instrument is needed to ensure all levels of stewardship is addressed in an appropriate manner.
5. The format, being principally two documents, and in the future, to include hotlinks (between each section as references arise) will be a significant step forward to highlight interdependencies in the code.
6. The new numbering system of the revised code is not future proof. Considering the audience, a more technical approach should be implemented to permit extension of sections. Those that will refer to the code on an ongoing basis are accustomed to technical numbering.
7. Excessive numbering decreases readability, examples of this are detailed in our detailed submission (attached). Where possible, suggested rewording has been included in section 'Concerns'.

[REDACTED]

[REDACTED]

[REDACTED]

Yours sincerely,

[REDACTED]

Technical and Regulatory Affairs Manager



EXECUTIVE SUMMARY

The Australian Beverages Council (ABC) has developed this response after extensive consultation with its membership as well as in consultation with other industry associations.

The ABC strongly supports the policies underlying Proposal P1025 Code Review (P1025), as published by Food Standards Australia New Zealand (FSANZ). The Australia New Zealand Food Standards Code (Code) is a key regulatory document that needs to be —

- (a) Relevant and applicable to modern food processing, handling and packaging
- (b) Legally enforceable
- (c) Clear in intent
- (d) Useable by the regulators, legal advisers and courts, but most especially by technical and regulatory specialists in the food industry who are responsible for interpreting and compliance
- (e) Uniform in operation across Australia and New Zealand to the extent possible; and
- (f) Reviewed, developed and maintained in accordance with regulatory best practice.

The ABC considers that the policy goals of P1025 can be achieved in a structure that more closely aligns with the existing Code and thus minimises the disruption and costs to Code users. The ABC **does NOT support the proposals to flow the numbering of all sections in each Chapter, nor the indiscriminate removal of schedules and tables to the end of the proposed Code.** However, some of the proposed innovations are recognised as being useful developments and **the ABC supports the introduction of new interpretative provisions and the inclusion of a Code 'dictionary'.**

The ABC **believes that both a regulatory impact assessment (RIA) and World Trade Organisation (WTO) notifications** in relation to P1025 are required.

The ABC notes that FSANZ's intention is that no product should require reformulation or relabelling as a consequence of P1025. Some issues have been identified where the proposed Code has introduced changes to the current regulatory environment that may require such changes. The ABC **recommends the establishment of a joint FSANZ / Regulators / Industry stakeholder team to work through all identified issues** so that they may be resolved as expeditiously as possible.

2. POLICY ISSUES

The ABC **strongly supports** the principle of reviewing the Code. Since the introduction of the current Code the nature of the industry and its relationship with food regulation and regulators has changed. Further, the processes of review and reform must be constant and evolving to preclude regulatory creep on the one hand (where new regulations are always introduced but old regulations never repealed) and regulatory inertia on the other (where out of date regulations impede new product development).

The ABC **strongly supports** the goal of enforceability for the Code. Regulatory compliance cannot be optional; it must be an even playing field where all food importers, manufacturers, packers and retailers are bound by the same basic laws.

The ABC **strongly supports** the need for clarity in the drafting of the Code. In some respects, P1025 introduces some significant achievements in this regard, most notably in the concept of bringing definitions together at the start of the document, and also notably in the introduction and wide use of “signpost” provisions and notes. The use of more active language and the implementation of a more consistent drafting style also improve the clarity of the Code.

The ABC **strongly supports** the need for usability of the Code. The principal users of the Code within industry, in terms of wide compliance, are technical and regulatory compliance staff working in the food and beverage industries, tasked with specifying and formulating products and designing labels and packaging. The Code as proposed in P1025 does not properly recognise the need for the Code to be used efficiently and effectively by this key stakeholder group. Some of the provisions are likely to be confusing or even seen as contradictory to a reader unless trained in legal interpretation.

Furthermore, consideration needs to be given that the Code is used by a wide variety of users with varying levels of expertise. In particular smaller food and beverage companies may not have the expertise / resources of larger companies, yet still need to be able to interpret the provisions of the Code.

The ABC considers that the concerns of its members in this regard can be significantly moderated by retaining the current structure of the Code without losing some of the important innovations proposed in P1025, and by working through the more complex areas of text with non-legal users to improve legibility and clarity of the requirements.

The ABC **strongly supports** the need for uniformity in how the Code is interpreted and applied throughout Australia and New Zealand. The economic benefits derived from a single bilateral market are essential for the maintenance and development of the beverage industry. With that in mind, the ABC recognises that the Code is one of many documents regulating food and beverages, and those differences in the implementation of the Model Food Act, for example, are beyond the scope of P1025. However, it still must be understood that the benefits of the regulatory reforms proposed in P1025 might be devalued unless there is also a commitment to continue to enhance uniformity across all aspects of food regulation, particularly in the language of State and Territory food legislation.

3. CODE STRUCTURE

P1025 proposes a significant restructuring of the Code. The ABC does NOT support the revised structure as set out in P1025, but considers some aspects of the proposed structure have merit that should be retained. The policy goals underlying P1025 that dictates the proposed structure are attainable under many possible structures, including ones that largely retain the existing structure.

In terms of structures that should be retained from the current Code, bearing in mind BOTH possible use of the document in paper and electronic forms:

- (a) In the ABC's view, Schedules should remain integrated with their applicable standards, except in relation to schedules that have operation across the entire Code. This keeps related and referenced information co-located. In paper document use, this minimises the

“flipping” of multiple pages backwards and forwards, and in electronic documents prevents the continuous need to be scrolling backwards or forwards, or swapping between windows, each of which breaks the workflow of the Code user.

- (b) The breakdown of the Code into individual Standards dealing with specific topics (e.g. ingredient labelling) or specific products (e.g. Formulated Caffeinated Beverages) should be retained. The Code is a huge document that, in order to be used efficiently and effectively needs conceptually to be broken down into manageable segments. While P1025 does so by way of “Divisions”, individual clauses are numbered consecutively within each Chapter, which makes identifying the clauses associated with a particular Standard somewhat obscure. Retaining Standards as distinct “chapters” serves both to conceptually break down the Code and capitalises on the food industry’s investment in staff knowledge of the current Code.

In terms of structures that the ABC considers are advanced by P1025, the ABC considers-

- (a) The inclusion of introductory provisions providing a legal basis for the Code is useful and should be implemented; and
- (b) The inclusion towards the start of the Code of an definitional section (a “dictionary” as it were), using signposts are required; is supported as a means to readily locating terms that perhaps extend beyond their ordinary meaning: however, it needs to be comprehensive, which at present is not.

It would also be helpful if the entire code was searchable electronically which currently it is not.

4. IMPLEMENTATION ISSUES

The ABC understands that the revised Code presented in P1025 and the two “comparison” documents are based on a version that appears to date from around November 2012. The Code has been amended since that time, but these subsequent amendments are not reflected in the P1025 documents. The ABC cannot comment on how these amendments might be implemented in a revised Code. This issue highlights the perils of trying to revise the entire Code in the manner proposed; given the Code is (for a regulatory document) a highly changeable and evolving document. P1025 does not provide any indication as to how this issue will be managed in the future such that industry will be able to fully comment on the proposed Code.

FSANZ must also advise how it plans to manage applications and proposals to vary the Code that are being assessed at the time that any new Code might be introduced.

The ABC understands that the intention of P1025 is that no change be made that might require a product to be reformulated or relabelled, and that on this basis there is no need for any transitional, stock in trade or particular commencement provisions. As is shown in section 5 below, the intention is not yet matched with a Code drafted by persons who, while skilled in regulatory drafting, have no subject knowledge and therefore have not properly translated current provisions to the proposed Code. P1025 has, to this extent, progressed too far before industry has been afforded the opportunity to comment and be involved in the process, and as a result the industry has been required to invest significant resources to undertake a clause by clause review of the drafting of the proposed Code. Looking to the future, the ABC is willing to work with FSANZ and other industry associations to help resolve these anomalies.

The documentation associated with P1025 does not appear to appreciate that industry may face significant costs and regulatory burden even if no reformulation or relabelling is required. Industry (and indeed regulators) has a substantial investment in staff knowledge and documentation that is based on the current Code, and any significant changes in content or structure devalues this investment and requires further investment in retraining and amending documentation for no benefit or return to industry and with dubious practical ability to pass such costs on. The ABC considers that these costs require evaluation in a Regulatory Impact Assessment, and calls on FSANZ to undertake this process. The ABC would be happy to assist FSANZ in such work, and acknowledges that the quantum and variety of these costs will vary greatly depending upon the degree of change in structure of the Code and the location of provisions within it.

Regulators and FSANZ will also face document revision costs. In FSANZ's case, it will need to promulgate changes to its Application Handbook, user guides, and so on.

Another key point is that Australia's export markets have a degree of familiarity with the existing Code structures. It is vital that FSANZ appreciates that unexpected changes in export documentation (even things such as the renumbering of regulatory provisions) can trigger delays and additional costs for Australia's exports, as foreign officials need to satisfy themselves that the new arrangements do not reflect any significant change in the status of the product. For this reason, the ABC believes that FSANZ needs to make WTO notifications so that Australia's export markets are prepared for any ensuing changes in documentation, or at least our exporters can refer overseas officials to the WTO notification by way of explaining such changes.

5. SPECIFIC COMMENTS

The ABC through its members has undertaken a review of the proposed Code to evaluate whether any significant changes exist. In broad terms, this process has shown that —

- (a) in some cases there is no change in the language at all;
- (b) in the majority of cases there is a change in the language, but no change in actual effect (in terms of labelling or composition) is anticipated;
- (c) in some cases, there are significant changes that appear to arise from the drafters not understanding the operation of the existing Code;
- (d) in other cases the drafter appears to have made some "executive decision" too deliberately change the requirements of the Code to correct what the drafter considered to be an anomaly: one example being the definition of "fruit drink";
- (e) New definitions of "key concepts" have been introduced which result in increased confusion and doubt, rather than serving to clarify: the proposed definition of "ingredient" is a typical example, which would make incidental dust an ingredient of a food.

It is accepted that the changes described in (c) to (e) above may have been well intentioned, or even inadvertent, but the policy of P1025 must remain that no formulation or label should be required to change as a result of these amendments.

The ABC, as stated above, supports the policy goals of P1025, including improving the language of

provisions where this improves enforceability or clarity. Further, the ABC believes that with further cooperative work, the anomalies categorised under (c) to (e) above can be rectified. In order to achieve this aim, the ABC **recommends** that a joint FSANZ / Regulator / Industry group be established to work through and resolve all identified issues ahead of the next round of public consultation. This group could also consider those provisions in the Code that, due to timing, were not reflected in the draft published as part of P1025.

Special mention is made in relation to a few issues –

- (a) More consideration is required in relation to the concepts of “ingredient”, “food additive”, “component”, “nutrient”, “processing aid” and “nutritive substance”. The relationship between these concepts is far from clear in the proposed Code, and “ingredient” in particular appears to be far too broad in scope and give rise to serious implications for composition and labelling.
- (b) There is unnecessary complexity introduced in the redrafting of some provisions e.g. the table to clause 2 of Standard 1.2.3, and the duplicatory and somewhat turgid language around definitional standards (“food sold on the basis of a representation that the food is”). There are also many cases where a change in language seems to have been made without truly considering whether the current language would serve equally well, and thereby avoiding change simply for its own sake.
- (c) The replacement of “final food” with “food product” is another generic change whose implementation is incomplete or requires further thought - the two are not exactly synonymous, for example, when considering the use of substances such as DMDC, and the current definition of “food product” would not encompass intercompany ingredient sales.

Detailed comments on the proposed Code can be found in Attachment 1.

6. CONCLUSION

The ABC strongly supports the policy goals of P1025, but considers that they can be achieved in a structure that more closely aligns with the existing Code and thus minimises the disruption to the key group of Code users.

The ABC considers more work needs to be undertaken in relation to particular redrafted or newly introduced provisions to ensure that the goal of no actual impact (in terms of composition and labelling) is achieved, and desires to work cooperatively with FSANZ to achieve this end. The ABC recommends that a joint FSANZ / Regulator / Industry group be established to progress this task ahead of the next round of public consultation.

The ABC believes that FSANZ needs to undertake a Regulatory Impact Assessment in relation to P1025 so that the secondary costs of retraining and re-documentation are formally recognised as well as the impact on the regulator.

The ABC considers that the WTO must also be notified of the proposed changes to minimise any impact on Australia’s export markets.

The ABC requests that FSANZ further consider and consult in relation to the implementation of any revised Code in terms of the management of contemporaneous applications and proposals and in

relation to any proposed commencement mechanisms.

Comment	Revision	Code Reference	Current Code	Concern
	Chapter 2—Food standards			
	Part 1—Cereals			
	Division 1—Bread and bread products			
	2.01	Compositional requirements for bread		
	2.02	Compositional requirements for wholemeal and wholegrain products		
	2.03	Application of sections 2.04 and 2.05		
	2.04	Requirement for folic acid and thiamin in bread		
	2.05	Requirement for iodised salt in bread		
	Part 2—Meat, eggs and fish			
	Division 1—Meat and meat products			
	Subdivision A—Interpretation			
	2.06	Definitions		
	Subdivision B—Compositional requirements			
	2.07	Compositional requirement for sausage		
	2.08	Compositional requirement for meat pies		
	Subdivision C—Information requirements			
	2.09	Statement indicating the presence of offal		
	2.1	Proportion of fat in minced meat		
	2.11	Information about raw meat joined or formed into the semblance of a cut of meat		
	2.12	Labelling of fermented comminuted processed meat		
	2.13	Labelling of fermented comminuted manufactured meat		
	2.14	Fermented comminuted meat—unpackaged		

	Subdivision D—Sourcing requirements			
	2.15	Bovine must be free from bovine spongiform encephalopathy		
	Division 2—Eggs			
	2.16	Application of Division		
	2.17	Sale or supply of unacceptable eggs		
	2.18	Traceability		
	Division 3—Fish and fish products			
	2.19	Meaning of <i>fish</i>		
	2.2	Labelling of formed or joined fish		
	Part 3—Fruit and vegetables			
	Division 1—Fruit and vegetables			
	2.21	Meaning of fruit and vegetables		
	2.22	Compositional requirement for fruit and vegetables in brine, etc		
	Division 2—Jam			
	2.23	Compositional requirement for jam		
	Part 4—Edible oils			
	Division 1—Edible oils			
	2.24	Compositional requirement for edible oils		
	2.25	Process declaration for edible oils		
	Division 2—Edible oil spreads			
	2.26	Compositional requirement for edible oil spreads and margarine		
	Part 5—Dairy products			
	Division 1—Milk			
	2.27	Compositional requirement for milk		
	2.28	Compositional requirement for cow's milk		
	2.29	Composition of skim milk		
	2.3	Addition of phytosterols, phytosterols and their esters to milk		
	Division 2—Cream			

	2.31	Compositional requirement for cream		
	Division 3—Fermented milk products			
	2.32	Compositional requirement for fermented milk and yoghurt		
	2.33	Addition of phytosterols, phytosterols and their esters to yoghurt		
	Division 4—Cheese			
	2.34	Compositional requirement for cheese		
	2.35	Addition of tall oil phytosterol esters		
	Division 5—Butter			
	2.36	Compositional requirement for butter		
	Division 6—Ice cream			
	2.37	Compositional requirement for ice cream		
	Division 7—Dried milk, evaporated milk and condensed milk			
	2.38	Compositional requirements for condensed milk		
	2.39	Compositional requirement for dried milk		
	2.4	Compositional requirement for evaporated milk		
	Part 6—Non-alcoholic beverages			
	Division 1—Fruit juice and vegetable juice			
Clarity	2.41	Meaning of <i>juice blend</i>	2.6.1 cl 1	Suggestion of 'fruit and/or vegetable' as many blends contain both fruits and vegetables
	2.42	Compositional requirement for fruit juice and vegetable juice	2.6.1, cl 1&2	

A positive note to clarify up to 10% total of mandarin and/or tangelo may be included in orange juice	2.43	Name and percentage by volume of juices in juice blend	2.6.1 cl 3	
	Division 2—Non-alcoholic beverages and brewed soft drinks			
Location of definition	2.44	Definitions	2.6.2 cl 1	Definition should appear at the beginning of the section, not throughout the text to improve clarity
Clarification	2.45	Composition of packaged water	2.6.2 cl 2	Question whether carbonated spring water is permitted, is in present code but not here and food additives section, also question whether water is a food
Clarification	2.46	Addition of fluoride to packaged water	2.6.2 cl 2A	Addition of fluoride suggest 1.0mg/L NOT 1 mg/L to maintain intent
Clarification	2.47	Labelling—composition of packaged water	2.6.2 cl 2B	(3) needs to be reworded to improve clarity, e.g. 'total fluoride including natural and added...'
	2.48	Compositional requirement for brewed soft drink	2.6.2 cl 3	
Clearly a definition, should appear in an earlier section	2.49	Compositional requirement for fruit drink	2.6.2, cl 2&4	Shift all definitions to 2.44, also is 'fruit' drink contentiously misleading as the whole fruit is not contained in the drink. Fruit juice drink would be less misleading a term if legislated.
	2.5	Non-alcoholic beverages not to be labelled or presented as alcoholic beverages	2.6.2 cl 5	
	2.51	Compositional requirement for electrolyte drinks and electrolyte drink bases	2.6.2 cl 6	
	2.52	Labelling of electrolyte drinks and electrolyte drink bases	2.6.2 cl 7	

Clarity on osmolality	2.53	Claims in relation to the tonicity of electrolyte drinks	2.6.2 cl 8	The requirement for osmolality (2) is currently only required if a claim is made, most relevant to smaller businesses without OSM Meter in house. Also, ambiguity on (3), remove 'on a package' to permit all advertising to include hydration/energy claims
	2.54	Compositional requirement for formulated beverages	2.6.2 cl 9	
	Division 3—Kava			
	2.55	Meaning of kava		
	2.56	Exception to prohibition		
	2.57	Labelling of foods containing kava		
	Division 4—Formulated caffeinated beverages			
Terms used inconsistently, interpretation should be definition, noted reference to water based beverage lost	2.58	Interpretation	2.6.4 cl 1	
Poor choice of words	2.59	Meaning of <i>one-day quantity</i>	2.6.4 cl 3(5)	Note to be shifted to definition, section should be termed calculation ('meaning' is inappropriate for calculation) and subsection 1 should refer to schedule 29, section 2a) should read for each substance listed in subsection (1) column 1 of the table in Schedule 29 that the beverage may contains, calculate the equivalent amount of the substance in accordance with the formula in subsection (3) of this clause;

Clarity of chosen terms poor	2.6	Composition of formulated caffeinated beverage	2.6.4 cl 2	Suggested wording to improve clarity of subsc : addition of (2), renumbering. Add (2) A formulated caffeinated beverage may contain the substances listed in column 1 of the table in schedule 29, provided that such substances that are present do not exceed the maximum one-day quantity amount as specified in column 2 of that table, renumber one day quantity to (3) and as subsec (4) A food must not consist of a mixture of a formulated caffeinated beverage must not be mixed with and a non-alcoholic beverage as described under Part 6 Division 2 of Chapter 2.
Change of labelling requirements	2.61	Labelling requirements—formulated caffeinated beverage	2.6.4 cl 3	Labelling of RDI dropped from old version, may lead to decreased consumer amenity
	Part 7—Alcoholic beverages			
	Division 1—Labelling of alcoholic beverages and food containing alcohol			
	2.62	Meaning of <i>standard drink</i>		
	2.63	Statement of alcohol content		
	2.64	Statement of the number of standard drinks		
	2.65	Restriction on representations of low alcohol		
	2.66	Restriction on representation of 'non-intoxicating'		
	2.67	Restriction on representation as non-alcoholic		
	Division 2—Beer			
	2.68	Compositional requirement for beer		
	Division 3—Fruit wine and vegetable wine			
	2.69	Meaning of <i>fruit wine product</i> and <i>vegetable wine product</i>		

		Compositional requirement for cider, mead, perry, fruit wine and vegetable wine		
	2.7			
	Division 4—Wine and wine product			
	2.71	Meaning of <i>wine product</i>		
	2.72	Compositional requirements for wine		
	Division 5—Spirit			
	2.73			
	2.74	Restriction on use of geographical indications		
	Part 8—Sugars and honey			
	Division 1—Sugars			
	2.75	Meaning of <i>icing</i> and <i>sugars</i>		
	2.76	References to sugar		
	2.77	Compositional requirement for white sugar		
	2.78	Compositional requirement for icing		
	Division 2—Honey			
	2.79	Compositional requirement for honey		
	2.8	Prescribed name		
	Part 9—Special purpose foods			
	Division 1—Infant formula products			
	Subdivision A—Preliminary			
	2.81	Outline of Division		
	2.82	Definitions		
	2.83	Interpretation		
	Subdivision B—General compositional requirements for infant formula products			
	2.84	Use of substances as nutritive substances		
	2.85	Addition of lactic acid producing microorganisms		
	2.86	Permitted quantities of added inulin- derived substances and galacto- oligosaccharides		

	2.87	Restriction on levels of other substances in infant formula product		
	Subdivision C—Infant formula and follow-on formula			
	2.88	Infant formula and follow-on formula—composition		
	2.89	Infant formula and follow-on formula—protein		
	2.9	Infant formula and follow-on formula—fat		
	2.91	Infant formula and follow-on formula—vitamins, minerals and electrolytes		
	Subdivision D—Infant formula products for special dietary use			
	2.92	Products formulated for premature or low birthweight infants		
	2.93	Products for metabolic, immunological, renal, hepatic and malabsorptive conditions		
	2.94	Products for special dietary use based on a protein substitute		
	Subdivision E—Labelling and packaging requirements			
	2.95	Representations about food as an infant formula product		
	2.96	Prescribed names		
	2.97	Requirement for measuring scoop		
	2.98	Requirement for warning statements and directions		
	2.99	Print size		
	2.1	Declaration of nutrition information		
	2.101	Date marking and storage instructions		

	2.102	Statements of protein source and dental fluorosis		
	2.103	Prohibited representations		
	Subdivision F—Guidelines			
	2.104	Guidelines for infant formula product		
	Division 2—Food for infants			
	2.105	Definitions		
	2.106	Food for infants—general compositional requirements		
	2.107	Additional compositional requirements for cereal-based food for infants over the age of 6 months		
	2.108	Additional compositional requirements for cereal-based foods for infants over the age of 4 months		
	2.109	Additional compositional requirements for non-cereal-based food for infants		
	2.11	Labelling		
	2.111	Additional labelling requirements relating to specific nutrients and energy information		
	2.112	Representations		
	2.113	Claims about vitamins and minerals		
	2.114	Nutrition information		
	2.115	Food in dehydrated or concentrated form		
	2.116	Storage requirements		
	Division 3—Formulated meal replacements and formulated supplementary foods			
	Subdivision A—Interpretation			
	2.117	Interpretation		
	Subdivision B—Formulated meal replacements			

	2.118	Meaning of formulated meal replacement		
	2.119	Compositional requirements for formulated meal replacements		
	2.12	Labelling of formulated meal replacements		
	Subdivision C—Formulated supplementary foods			
	2.121	Meaning of formulated supplementary food		
	2.122	Compositional requirements for formulated supplementary foods		
	2.123	Labelling of formulated supplementary foods		
	Subdivision D—Formulated supplementary foods for young children			
	2.124	Meaning of <i>formulated supplementary food for young children</i>		
	2.125	Compositional requirements for formulated supplementary foods for young children		
	2.126	Labelling of formulated supplementary foods for young children		
	Division 4—Formulated supplementary sports foods			
	Subdivision A—Formulated supplementary sports foods generally			
	2.127	Definitions		
	2.128	Composition of formulated supplementary sports foods		
	2.129	Labelling information		
	2.13	Nutritive substance claims		
	2.131	Vitamin and mineral claims		
	2.132	Prohibition on representations		
	Subdivision B—Particular formulated supplementary sports foods			
	2.133	High carbohydrate supplement		

	2.134	Protein energy supplement		
	2.135	Energy supplement		
	Division 5—Food for special medical purposes			
	Subdivision A—Preliminary			
	2.136	Meaning of <i>food for special medical purposes</i>		
	2.137	Definitions		
	2.138	Application of other Standards		
	2.139	Claims must not be therapeutic in nature		
	Subdivision B—Sale of food for special medical purposes			
	2.14	Restriction on the persons by whom, and the premises at which, food for special medical purposes may be sold		
	Subdivision C—Composition			
	2.141	Permitted forms of particular substances		
	2.142	Compositional requirements for food represented as being suitable for use as sole source of nutrition		
	Subdivision D—Labelling			
	2.143	Labelling and related requirements		
	2.144	Mandatory labelling information		
	2.145	Advisory and warning statements—food for special medical purposes		
	2.146	Information relating to ingredients—food for special medical purposes		
	2.147	Date marking information—food for special medical purposes		
	2.148	Nutrition information—food for special medical purposes		

	2.149	Claims in relation to lactose content		
	2.15	Claims in relation to gluten content		
	2.151	Labelling requirement—food for special medical purposes in inner package		
	2.152	Labelling requirement—food for special medical purposes in transportation outer		
	Division 6—Transitional standard for special purpose foods (including amino acid modified foods)			
	2.153	Meaning of amino acid modified food and special purpose food		
	2.154	Application		
	2.155	Composition		
	2.156	Labelling of special purpose foods		
	2.157	Labelling of amino acid modified foods		
	Part 10—Standards for other foods			
	Division 1—Vinegar and related products			
	2.158	Compositional requirement for vinegar and imitation vinegar		
	Division 2—Salt and salt products			
	Subdivision A—Compositional requirements			
	2.159	Compositional requirement for salt		
	2.16	Compositional requirement for reduced sodium salt mixture		
	2.161	Compositional requirement for salt substitute		
	2.162	Compositional requirement for iodised salt		
	Subdivision B—Labelling requirements			

		Labelling requirement for reduced sodium salt mixtures and salt substitutes		
	2.163			
	Division 3—Chewing gum			
	2.164	Meaning of <i>releasable calcium</i>		
	2.165	Addition of calcium to chewing gum		
	2.166	Claims about the presence of calcium in chewing gum		
	2.167	Labelling requirements		
	Division 4—Miscellaneous standards for other foods			
	2.168	Compositional requirements for tea and coffee		
	2.169	Compositional requirement for peanut butter		
	2.17	Miscellaneous compositional requirements		