



# Dairy Goat Co-operative

18 Gallagher Drive, PO Box 1398, Hamilton 3240, New Zealand  
Phone (64 7) 839 2919 Fax (64 7) 839 2920 Website [www.dgc.co.nz](http://www.dgc.co.nz)

2nd August 2016

To FSANZ: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au).

## SUBMISSION

### FSANZ Proposal P1034 Call for Submissions 10 June 2016 Chemical Migration from Packaging into Food (abbreviated as 'CMPF')

#### Submitter:

Dairy Goat Co-operative (N.Z.) Ltd  
18 Gallagher Drive  
Hamilton 3240  
New Zealand

**Level at which submission authorised:** authorised by GM Strategy and Commercial

#### Contact persons:

██████████, Regulatory and Technical Liaison Manager ██████████ and  
██████████, Product Compliance Manager ██████████ and

DGC phone (reception): +64 7 839 2919

DGC fax: +64 7 839 2920

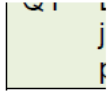
#### Information regarding the submitter

Dairy Goat Co-operative (N.Z.) Ltd, (abbreviated as 'DGC'), is a New Zealand manufacturer, developer and exporter of premium consumer packaged nutritional powders primarily for infants and young children. It is a leading New Zealand exporter, and services approximately 20 international markets via its marketing partner and joint venture relationships. The markets are located primarily in Asia, Europe and Oceania.

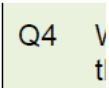
#### Introduction

DGC supports a graduated approach as proposed by FSANZ which addresses: chemicals with different risk profiles; concerns about clarity of current requirements as well as gaps in awareness.

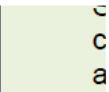
## Responses to Questions in Call for Submissions Paper



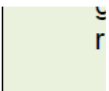
The focus for identifying new potential risks should be on-going monitoring of developments. Surveillance is of limited use in managing unknown risks unless there is good intelligence regarding potential new risks to guide this work.



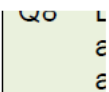
DGC could accept the status quo but recognises that there are currently gaps in awareness and management of CMPF. DGC therefore supports the graduated approach favoured by FSANZ and believes that this approach, coupled with an education/awareness/information campaign, would lead to better overall management of CMPF.



Not applicable. DGC does not support a prescriptive approach.



This question relates to education/awareness/information programs. The provision of general information to consumers, particularly with regard to the outcome of the risk assessment conducted by FSANZ, will be helpful to better inform consumers and increase understanding of the level of risks posed by CMPF. Such awareness programs will also increase awareness within industry but may not be sufficient to achieve the level of awareness sought.



Consumer advocacy organisations should also be engaged in consumer awareness activities.

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Q10: The development of a guideline will lead to better awareness and implementation of measures to manage CMPF across industry and provide a valuable 'go to' resource.

Q11: Yes, the information examples listed would all be appropriate for inclusion in a guideline. In addition, information on risk assessment and residual risk is recommended for inclusion.

Q12: Yes, all the industry standards and CoPs identified should be included in guidelines. It may be appropriate for some that do not include food safety measures per se to be provided as an additional resource or reference list.



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Q14: It is noted that MPI is already undertaking work to identify if there are any further requirements needed under the NZ Food Act and that this work will consider whether more specific requirements for packaging are needed. Further characterisation of the risks posed by DEHP and DINP may trigger discussion in this regard (see response to next question).

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Before limits for DEHP and DINP in foods are considered there first needs to be greater characterisation of the risk. It is our understanding that fatty foods (such as milk products, fish or seafood, and oils) that are packaged in plastics that contain DEHP are more likely to have higher concentrations than other foods (see <http://www.atsdr.cdc.gov/toxfaqs/TF.asp?id=377&tid=65>). Other measures, such as limiting the use of DHEP-containing packaging to use for foods that primarily contain water, may be more effective to reduce exposure risk.

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Q16: MPI is recommended to be the peak body utilised in New Zealand.

Q17: The Food Safety Centre established at Massey University in New Zealand could potentially be used to undertake surveillance activities within New Zealand.

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Co-operative

Q18: The introduction of a prescriptive approach may result in greater compliance costs, but the negligible additional costs are foreseen for other options discussed (status quo/non-regulatory approaches/graduated approach).

Q19: Not applicable.

Q20: Surveillance costs can be high and careful management of surveillance activities is recommended to achieve value for funding used for this purpose.