



Committee Secretary  
Community Affairs Committee  
Department of the Senate  
PO Box 6100  
Parliament House  
Canberra ACT 2600

By email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

13 April 2007

Dear Sir

The Australian Chamber of Commerce and Industry (ACCI), Australia's largest and most representative business organisation wishes to endorse the submission provided by our member the Australian Beverages Council Ltd on the Food Standards Australia New Zealand Amendment Bill 2007.

In particular we support the three specific recommendations they have outlined:

***Recommendation 1***

*The Council suggests that the Bill be amended so that all editorial notes and examples be removed from the body of the Food Standards Code.*

***Recommendation 2***

*The Council suggests that if the Amendment Bill should continue to permit editorial notes to be retained within the body of the Food Standards Code, then the Bill should contain the detailed procedures, consultation and as a minimum Ministerial approval process, with the option of disallowance by the Senate as per other regulations.*

*Should the Parliament deem it that such consideration would delay the passage of the legislation, then we strongly recommend that the current procedures for amendment to the Food Standards Code apply to editorial notes, except to correct an error of fact.*



**Recommendation 3**

*That the provision for an additional “stop-the-clock” provision of 18 months when the FRMC decides that a new policy guideline is needed should be excised from the Bill.*

*In the event that this is not acceptable, we strongly urge that FSANZ should then immediately refund any moneys paid by applicants for expediting their Applications until it is “capable” of recommencing work on the Application under consideration.*

ACCI concurs with the Australian Beverages Council and supports any proposal that aims to achieve a more efficient and internationally competitive Food Regulatory development system. We also agree many of the provisions of the proposed legislation aim to achieve just this objective and are therefore supported.

Thank you for allowing ACCI to register these comments and if you have any further inquiries please feel free to contact me.

Yours sincerely



Greg Evans  
Director Industry Policy