



Submission to
Food Standards Australia New Zealand
Call for submissions 2 –Proposal P1028
Infant formula

27 June 2023

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Introduction

This submission on behalf of Danisco Australia and Danisco New Zealand, is made in response to the Food Standards Australia New Zealand 2nd Call for Submissions, Proposal P1028—Infant Formula.

Danisco/IFF

Danisco (henceforth referred to as IFF) operates in Australia and New Zealand as subsidiary of International Flavors and Fragrances Inc (IFF), manufacturer/marketer of specialty food ingredients (including probiotics), food additives, flavourings and food processing aids.

Upon consideration this second call for submissions, and the associated supporting documentation, we welcome the opportunity to provide comment, to Food Standards Australia New Zealand on the Regulation of Infant Formula Products.

The comments that follow are addressed specifically to Sections 4 Novel Foods and Nutritive Substances and 5 Lactic Acid Producing Bacteria of the 2nd CFS for submission document.

General Comment

IFF supports the primary objective of FSANZ's P1028 review to protect public health and safety. We also agree with the premise that infant formula must be safe for formula-fed infants to consume, and caregivers need to know how to safely prepare, use and store the product. It is also our general position that the FSANZ Standard 2.9.1 Infant Formula products should, where FSANZ's primary objectives are satisfied, align with the relevant Regulations and Standards in the EU and CODEX, respectively.

Confidentiality

IFF are not providing any information that is confidential in nature in this submission.

4.2 Novel foods – Schedule 25

In our response to both Consultation Paper 3 (CP3), and the 1st Call for Submissions (1st CFS) IFF (Danisco) provided confidential information in respect of one of the Schedule 25 permissions that were discussed in Section 4.2. FSANZ have taken consideration of our submissions on Schedule 25, and we are pleased that the outcomes presented in Section 4 of the 2nd CFS have adequately addressed our concerns. We, therefore, support the outcomes proposed in Section 4 of the 2nd CFS document.

5.4 L (+) lactic acid producing microorganisms (LAM)

IFF are pleased to note that, following review of the submissions to 1st CFS, the FSANZ 2021 conclusion on safety of infant formula products supplemented with non-pathogenic, nontoxigenic L- and DL-lactic acid producing bacteria remains unchanged. For reasons provided in our submission to the 1st CFS, IFF are supportive of FSANZ decision to revert to the current permissions for LAM, and to not include additional clarification text.

In conclusion, IFF thank FSANZ for the opportunity to provide comment to the proposed Infant Formula Standard.