

Submission – Proposal P1028 Infant Formula

2nd call for submissions- Proposal P1028

Infant formula

Submission Deadline: 7th July, 2023

Individual Submission from:

[REDACTED]

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FSANZ Porposal P1028

2nd Call for submissions document

- Section 2.3.4 is not supported by myself. Lactose free or low lactose infant formula should not be sold to the general public as infant formula.
- Section 3.9. – 58 Stage labelling, product differentiation and proxy advertising, not supported.

Overview:

Issue 1: Lactose free or low lactose infant formula should be classified as Special Medical Purpose Product for Infants.

Issue 2: Should identify whether poses a risk to infants that may consume the product without having a lactose intolerance.

Rationale:

It is imperative that lactose free or low lactose infant formula is classified as a SMPI and be regulated as such. The fact that it was created with the intention for infants with lactose intolerance should be clearly outlined and advertising needs to be controlled to some degree. I was unable to identify whether the lactose free or low lactose formula proposal clearly outlines the potential risks if an infant without a lactose intolerance/sensitivity diagnosis consumed the product. Furthermore, highlighting that if lactose intolerance is a concern of the parents purchasing the product, that a health professional needs to be consulted prior to purchasing the product. Therefore, ensuring the 1). Parents of the infant are aware the importance of identifying exactly what the issues are they are concerned with (if they are considering buying a lactose free formula) and furthermore, ensuring that any health concerns do not go undiagnosed by purchasing the lactose free formula, potentially masking the underlying issues.

