



30 May 2016

Standards Liaison Officer  
Food Standards Australia New Zealand

By email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

### **Proposal P1028 – Infant Formula**

On 23 February 2016, Food Standards Australia New Zealand called for submissions in relation to Proposal P1028, Infant Formula [05-16].

The a2 Milk Company Pty Ltd (a2MC) has had the opportunity to contribute to and review the submission of the Infant Nutrition Council (INC) on this Proposal and in general, supports the position taken and comments made in that submission.

a2MC does not intend to make a separate submission, however we would like to highlight a position on the following two matters:

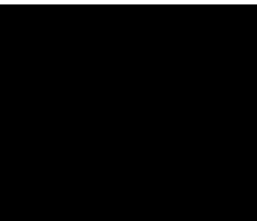
1) Calculation of protein: nitrogen conversion factors

a2MC supports the use of the two existing conversion factors. It is imperative that the conversion factor of  $N \times 6.38$  is retained in the Code for economic, sustainability and scientific reasons. Codex identifies a single nitrogen conversion factor of  $N \times 6.25$  with the ability to use  $N \times 6.38$  or 'other' unless scientific justification provides for the use of a different conversion factor for a particular product. Manufacturers have been using both conversion factors since the inception of Standard 2.9.1 Infant Formula Products. Some manufacturers have a preference for one over the other and are able to apply the factor that is most appropriate to the market of sale. It is important that this flexibility is maintained.

2) P1024 – Revision of the Regulation of Nutritive Substances and Novel Foods

It is currently unclear how P1024 - Revision of the Regulation of Nutritive Substances and Novel Foods proposal will interact with P1028 - Infant Formula. As the current proposal explicitly excludes Infant Formula Products, a2MC question how pre-market assessment of ingredients destined for use in Infant Formula will be determined and in which Standard the requirements will be included.

a2MC look forward to the opportunity to provide further input into future consultations on this matter.



Group Quality and Regulatory Affairs Manager



The a2 Milk Company (Australia) Pty Ltd

ABN 52 125 331 213

Level 11, 80 Mount Street North Sydney NSW 2060 Australia – PO Box 1564 North Sydney NSW 2059 Australia

+61 (0)2 9697 7000 – [www.a2milk.com.au](http://www.a2milk.com.au)