30 May 2016

Standards Management Officer
Food Standards Australia New Zealand
Boeing House
55 Blackall Street
BARTON ACT 2600
Email: standards.management@foodstandards.gov.au

Dear Standards Management Officer,

PROPOSAL P1028 REVIEW OF INFANT FORMULA

Murray Goulburn welcomes the opportunity to present this submission in response to P1028 Infant Formula Review.

Murray Goulburn believes that breastfeeding is the best way to feed infants as it has numerous benefits for both mothers and babies. When an infant is not given breast milk the only suitable and safe alternative is a scientifically developed infant formula product.

Harmonisation with Codex and other relevant international standards is critical to ensuring the best science is applied to infant formula products in Australia and New Zealand.

In considering the number of issues raised by FSANZ, Murray Goulburn provides the following general views below. Please note that Murray Goulburn are also in support of the Infant Nutrition Council and Dairy Australia's submission.

SUMMARY: OVERARCHING KEY POINTS FOR MURRAY GOULBURN

- Supports that status quo should prevail for the infant formula definition until the follow-on formula requirements are reviewed.

  Macronutrients:

- Agrees with FSANZ to maintain the minimum and maximum levels of protein (subject to correct conversion to per 100 kJ). Supports retaining the minimum and lowering the maximum of fat content to align with Codex STAN 72-1981. No limits should be specified for carbohydrates, in the absence of specific safety concerns or evidence of adverse effects in infants.

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Safety and Food Technology:

- Supports the FSANZ proposal relating to directions to prepare bottles individually, directions for the storage of made up formula directions on water used to reconstitute powdered infant formula, discarding leftover formula, directions for preparation and use, date marking of food, and storage instructions for opened infant formula. Note the statement that it is safe to store prepared formula for up to 24 hours in the refrigerator needs clarification that it is not prescribed and that there is flexibility for the time limit to be for up to 24 hours.

- Supports maintaining the mandatory statement about protein source and for it to be located immediately adjacent to the name of the infant formula. However, Murray Goulburn does not support prescribing where this should be located on the label.

- Strongly opposes standardisation of measuring scoops for the reasons FSANZ has identified. The powder density of infant formula is affected by both the ingredients and the manufacturing process used and it is not possible for this to be standardised for all powdered infant formulas.

- Strongly supports continuation of the carry-over principle for food additives in infant formula. As well, supports alignment with Codex in relation to permitted carry-over additives. These additives may be present in any food as a result of carry-over from a raw material or an ingredient and are technologically necessary for the quality of the product.

Nutritive substances and novel foods pathways to market:

- Proposal P1024 excluded Standard 2.9.1 from its scope therefore Murray Goulburn supports Standard 2.9.1 being included within the scope of Proposal P1024 and the framework proposed in the Proposal going forward.

- No pre-market assessment should be required for all substances and supports an approach where by nutritive substances and novel foods should be regulated in the same manner as for general foods.

Trade implications:

- As a significant amount of infant formula produced in Australia is sold either in both the domestic and export markets (or exclusively into export markets), encouraging standards development aligned with international standards such as Codex would be useful in reducing the difference.

Provision of information:

- Murray Goulburn maintains that the declaration of macronutrient sub-groups in a nutrition information statement is permitted and should be retained. It is important and should be included in the nutrition

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information statement to help caregivers and health care professionals differentiate between different infant formulas.

- Ingredients lists and nutrition information statements are fundamentally different therefore Murray Goulburn does not support additional prescription on how nutrients are labelled. A consistent format of nutrition statement across product labels would not reflect this nor assist consumer understanding of this information. Not all infant formulas are the same and this is not supportive of product differentiation.

- Murray Goulburn is not in support of aligning the names of ingredients with nutrient declarations in the nutrition information statement. The information serves different purposes and the ingredients list includes additions of, for example vitamins and minerals, while the nutrition information statement includes total amounts (naturally occurring and added) and not necessarily information about its source.

- Murray Goulburn supports the retention of the requirement that nutrition information be expressed per 100mL. A voluntary option for manufacturers to include the base units of per 100g would also be supported. This would be particularly useful for those markets that have adopted the Codex provision of using per 100g allowing harmonisation with those requirements on an as needs basis.

- The ability to make nutrient content claims would provide minimal factual information to caregivers and health care professionals to enable a level of differentiation between products on the market.

Transitional Timings and other Infant Formula Products:

- Requests any transitional period be of reasonable length to allow adequate time to implement changes, particularly for imported infant formula that is not manufactured in Australia and New Zealand.

- Lastly, while the scope of Proposal P1028 relates to infant formulas only, it is considered that it will, in future proposals, underpin the review of the remaining infant formula products. Murray Goulburn requests that transitional arrangements are considered in the context of those products in Standard 2.9.1 that are not currently within scope of Proposal P1028.

If you have any further queries please feel free to contact me.

Yours faithfully,

[redacted]
NUTRITION AND REGULATORY AFFAIRS MANAGER
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[redacted]
[redacted]