

submissions

From: [REDACTED]
Sent: Monday, 23 May 2016 2:26 PM
To: submissions
Subject: Submission: Consultation Paper – Proposal P1028

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

Re: Consultation Paper – Proposal P1028

Dear Sir/Madam

I wish to make a submission regarding the definition of 'potable, previously boiled water' that should be used for preparing infant formula.

Paragraph 14(2)(c) of Standard 2.9.1 (paragraph 2.9.1—19(3)(c) in the revised Code) requires the directions for the preparation and use of the infant formula to include instructions that potable, previously boiled water should be used. FSANZ's preliminary view is that the current requirement to use cooled previously boiled water does not need to be modified, as there are no public health and safety concerns with caregivers following labelling directions regarding the use of potable, previously boiled water when the other instructions are followed. The requirement also reflects both the Australian and New Zealand infant feeding guidance. Therefore, FSANZ's preliminary view is to maintain this labelling requirement as one of a group of risk reduction strategies, and seeks stakeholders' comments on this position.

Our business is developing an infant formula ready bottled water. The water is pasteurised as part of the production process. There is an existing infant formula water product on the market that already includes pasteurisation as a key part of its microbiological (<http://www.bebidrinks.com.au/water/>).

Technically it appears we could launch under the current regulations, however, I would like this Paragraph to be amended, specifically the term 'potable, previously boiled water' to be changed to 'potable, previously boiled or pasteurised water' or words to that effect to accept the use of pasteurisation as well.

Please let me know if you require any further information.

Yours sincerely,
Gavin

Gavin Ronan
Director
Apteso Pty Ltd

[REDACTED]