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**RE: P1028 Infant Formula Regulatory Requirements Public Submissions**

To FSANZ review board,

We are a Trans-Tasman based food consultancy that has been operating for 6 years. We specialise in Food Safety, Regulatory compliance, and product development. As part of this submission, we represent the Sheep Milk companies that we have worked with in the past, and currently work with.

We fully understand the need for reviewing the regulatory requirements for infant formula as this is a necessary evolution in a product that is consumed by a very sensitive population. Currently there are bovine, caprine, plant based and ovine offerings in the market, all of which are scientifically formulated and safe products to consume.

We object to and find it hard to believe that market offerings which have been proven over time as safe to consumers, could be removed from regulatory approval for no scientific reason. The protein source in these products is only a percentage of what is a highly value add, and ingredient rich product. These ingredients across different protein bases are very similar and share, on the whole the same nutrient suppliers.

I am sure there is plenty evidence out there of infants that have thrived on one protein-based formula if another was not suitable to their metabolism. Some of these protein bases of which FSANZ is looking at excluding with this revision. We request FSANZ to show their evidence of why you would exclude an Ovine or plant-based protein formula when there are real world examples of it filling a proven and safe demand in the market.

Large multinational companies that will undoubtedly be supplying submissions to this revision who have multi layered scientific resources behind them and from all over the world have these products in the market. They would simply not bank their reputation on putting something out that was not suitable for their consumer base.

We have over 60 years of Infant formula experience in Produco over 4 senior staff, none of which have seen issues with ovine based protein products in their careers. We stand behind the other submitters and back their evidence as to keeping particularly Ovine based protein infant formula relevant and regulated.



We finally point FSA NZ to the documented evidence of the results from the NZ Food Safety National Chemical Contaminants Programme (Raw Milk) July 2020-June 2021 ([National Chemical Contaminants Programme Raw Milk Results Summary \(July 2020 to June 2021\)](https://www.mpi.govt.nz/national-chemical-contaminants-programme-raw-milk-results-summary-july-2020-to-june-2021/) ([mpi.govt.nz](https://www.mpi.govt.nz)))

*In summary:*

- *Over the 1 July 2020 to 30 June 2021 dairy season there were no results exceeding New Zealand maximum residue levels (MRLs) for sheep milk*
- *14 samples in total tested for sheep milk (statistically based at farm level) - The NCCP is designed to:*
  - *confirm the effectiveness of the regulatory controls in place for ensuring residues and*
  - *contaminants in raw milk and manufactured dairy products do not pose a threat to human*
  - *health.*
  - *that Good Agricultural Practice is being followed; and*
  - *that relevant importing country requirements will be met.*
- *The randomly allocated sampling of raw milk occurred at the farm bulk milk tank prior to any further consolidation, co-mingling, or dilution with raw milk from other farms.*
- *More than 500 individual compounds or elements including:*
  - *veterinary medicines*
    - *antibiotics*
    - *anthelmintics*
    - *NSAIDS*
  - *contaminants*
    - *aflatoxins*
    - *chemical elements*
    - *process contaminants and biocides*
  - *agricultural compounds*
    - *insecticides*
    - *herbicides*
    - *fungicides*
  - *other compounds such as withdrawn compounds or those not permitted for food producing animals*

Yours truly,

