To the Standards Management Officer,
Food Standards Australia New Zealand.

Dear Sir/Madam,

Re: PRELIMINARY FINAL ASSESSMENT REPORT - proposal P274 - Review of minimum age labelling of foods for infants.

The Australasian Society of Clinical Immunology and Allergy (ASCIA) wishes to submit a comment on the PRELIMINARY FINAL ASSESSMENT REPORT - proposal P274 - "Review of minimum age labelling of foods for infants", and requests an EXTENSION OF THE DEADLINE FOR SUBMISSION by a period of 1 week. This extension is requested to allow completion of an ASCIA document on "infant feeding advice" that will provide important information pertaining to the FSANZ review and report.

The issue of timing for introduction of foods into the diet of infants is controversial and is currently undergoing review by several professional and regulatory bodies including the National Health and Medical Research Council and ASCIA. These reviews have been initiated for a variety of reasons, including discrepancies between the currently available feeding guidelines, and the publication of new information pertaining to introduction of foods and the prevention of allergic and autoimmune diseases.

Specifically, in considering the role of diet in the development of allergic disease, it is now acknowledged that there is no evidence to support recommendations to delay the introduction of solid foods beyond 4-6 months of age. Furthermore, some new studies suggest that delayed introduction of solid foods beyond 6 months of age may be associated with an increased risk of food allergy and celiac disease.

Therefore, for the 'FSANZ Review of minimum age labelling of foods for infants', the currently available information would NOT support the proposed option 1 as outlined in the Preliminary final assessment report, but would instead support Option 2 - to retain current labelling practices.

The Paediatric Committee of ASCIA is currently developing 'Infant feeding advice for parents concerned about allergic disease' and reviewing their 'Guidelines for the prevention of allergic disease'. This process is close to completion with late stage draft documents being finalised (expected completion date 21st September). ASCIA believes that the final ASCIA consensus document on 'Infant feeding advice for parents concerned about allergic disease' will have important implications for the FSANZ "Review of minimum age labelling of foods for infants".

We respectfully request an extension of the deadline for submission of comments on the PRELIMINARY FINAL ASSESSMENT REPORT - proposal P274 - "Review of minimum age labelling of foods for infants" to the 24th of September.

Thank you
Sincerely

Chairman, Paediatric Committee
The Australasian Society of Clinical Immunology and Allergy