Development of joint
Australia New Zealand Food Standards

As part of the process of the Review of the
Food Standards Code

TRANSITIONAL ARRANGEMENTS FOR INFANT FORMULA PRODUCTS

Proposal P226

October 2000

The Authority should receive written submissions no later than 24 October 2000

Submissions should be sent to:

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Australia New Zealand Food Authority
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Wellington 6036
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Submissions will be placed on the Authority’s public register (unless a claim of commercial confidentiality is made and accepted by the Authority) and will therefore be open to public scrutiny.

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This paper was prepared by the Australia New Zealand Food Authority.
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PREFACE

In July 1996 an Agreement between Australia and New Zealand came into force which established the Australia New Zealand Food Authority (ANZFA)—a system for developing joint food standards and an Australia New Zealand Food Standards Code.

The aim of the Agreement is to extend the Australian food standard system to include New Zealand so that food standards developed by ANZFA and approved by the Australia New Zealand Food Standards Council can be adopted throughout Australia and in New Zealand. The current review of the Australian Food Standards Code is an important element in developing joint standards. The provisions of the Agreement provide common policy objectives for developing food standards and a common approach to a transparent, timely, consultative and accountable standards setting process—both key features of the review process. ANZFA is seeking to ensure full New Zealand participation in the standards setting process and the review of food standards.

Public comment was sought on the recommendations made in the paper. This paper takes these comments received in respect of each issue into consideration and makes further recommendations and proposes draft variations to the Food Standards Code for revised requirements for public comment.

BACKGROUND

2.1 Australia New Zealand Food Authority

ANZFA is a joint statutory body responsible for making recommendations on food standards which, when approved by the Australia New Zealand Food Standards Council, are adopted by reference and without amendment into the food laws of the Australian States and Territories. In New Zealand, for the time being, such standards apply as part of a system of dual standards, where the Australian Food Standards Code is recognised as an alternative to the New Zealand Food Regulations 1984 (NZFR). At a future date, standards in the NZFR will be repealed and the standards developed under the joint system will apply in both countries.

ANZFA’s other functions include;

• developing codes of practice for industry on any matter that may be included in a food standard;
• coordinating the surveillance of food in Australia;
• liaising with the Ministry of Health in New Zealand on arrangements for imported foods;
• conducting research and surveys in relation to food standards matters;
• developing food safety education initiatives in cooperation with the States and Territories; and
• assisting in the coordination of food recalls in Australia.
The Ministry of Health manages recalls in New Zealand. In Australia, ANZFA develops assessment policies in relation to imported food.

2.2 Review of Food Standards

In July 1996, an Agreement between Australia and New Zealand came into force which established the Australia New Zealand Food Authority - a system for developing joint standards and an *Australia New Zealand Food Standards Code*.

The aim of the Agreement is to extend the Australian food standard system to include New Zealand so that food standards developed by ANZFA and approved by Ministerial Council can be adopted throughout Australia and in New Zealand. The provisions of the Agreement provide common policy objectives for developing food standards and a common approach to a transparent, timely, consultative and accountable standards setting process - both key features of the review process. ANZFA is seeking to ensure full New Zealand participation in the standards setting process and the review of food standards.

In developing or reviewing food standards, ANZFA must have regard to the objectives outlined in section 10 of the *Australia New Zealand Food Authority Act 1991*.

Consistent with these statutory objectives and the policies of ANZFA, the review will, where possible:

- reduce the level of prescriptiveness of standards to facilitate innovation by allowing wider permission on the use of ingredients and additives, but with consideration of the possible increased need for consumer information;
- develop standards which are easier to understand and make amendment more straightforward;
- replace standards which regulate individual foods with standards that apply across all foods or a range of foods;
- consider the possibility of industry codes of practice as an alternative to regulation; and
- facilitate harmonisation of food standards between Australia and New Zealand.

The review will also be carried out in accordance with the competition policy principles which have been adopted by the Council of Australian Governments and the draft Code of Good Regulatory Practice (New Zealand). These principles require the review of all business regulation to remove unnecessary obstacles to competition, and an assessment of the social, environmental, and economic impacts as well as the impacts on health of proposed regulation on all affected sectors of the community.

2.3 Food Standards Setting in Australia and New Zealand

The Governments of Australia and New Zealand entered an Agreement in December 1995 establishing a system for the development of joint food standards. ANZFA is now developing a Joint Code which will provide compositional and labelling standards for food in both Australia and New Zealand.
• **Food imported into New Zealand other than from Australia must** comply with either the Australian *Food Standards Code*, as gazetted in New Zealand, or the New Zealand *Food Regulations 1984*, but not a combination of both. However, in all cases maximum residue limits for agricultural and veterinary chemicals must comply solely with those limits specified in the New Zealand *Food Regulations 1984* and the New Zealand (Maximum Residue Limits of Agricultural Compounds) Mandatory Food Standard 1999.

• **Food imported into Australia other than from New Zealand** must comply solely with the Australian *Food Standards Code*.

• **Food imported into New Zealand from Australia** must comply with either the Australian *Food Standards Code*, as gazetted in New Zealand, or the New Zealand *Food Regulations 1984*, but not a combination of both.

• **Food imported into Australia from New Zealand** must comply with the Australian *Food Standards Code*. However, under the provisions of the Trans-Tasman Mutual Recognition Act, food may also be imported into Australia from New Zealand provided it complies with the New Zealand *Food Regulations 1984*.

• **Food manufactured in Australia and sold in Australia** must for most products comply solely with the Australian *Food Standards Code*.

In addition to the above, all food sold in New Zealand must comply with the New Zealand *Fair Trading Act 1986* and all food sold in Australia must comply with the Australian *Trade Practices Act 1974*, and the respective Australian State and Territory Fair Trading Acts.

Any person or organisation may apply to ANZFA to have the *Food Standards Code* amended. In addition, ANZFA may develop proposals to amend the Australian *Food Standards Code* or to develop joint Australia New Zealand food standards. ANZFA can provide advice on the requirements for applications to amend the *Food Standards Code*.

### 2.4 World Trade Organization (WTO) Notification

Both Australia and New Zealand are members of the World Trade Organization and signatories to the agreements on the Application of Sanitary and Phytosanitary Measures (SPS agreement) and on Technical Barriers to Trade (TBT agreement). Within Australia, a memorandum of understanding binding all States and Territories to the agreements has been put in place by the COAG.

In addition, the agreement between the Government of Australia and the Government of New Zealand on joint food standards explicitly requires the Authority to ensure that food standards are consistent with the WTO obligations of both countries.

The WTO agreements are predicated on a set of underlying principles that standards and other regulatory measures should be;

• based on sound scientific principles;
• developed using consistent risk assessment practices;
• transparent;
• no more trade-restrictive than necessary to achieve a legitimate objective;
• recognise the equivalence of similar measures in other countries; and
• not used as arbitrary barriers to trade.

As members of the WTO, both Australia and New Zealand have an obligation to notify the WTO of changes to food standards to enable other member countries of the WTO to make comment. Notification is required in the case of any new or changed standards which may have a significant trade effect and which depart from the relevant international standard (or where no international standard exists). Matters raised in this proposal may be notified to the WTO as either SPS notifications or TBT notifications or both, so other members of the WTO can assess them and make comments on them.

**SPS Notifications**

These are primarily health related, and refer to any measure applied;

• to protect animal or plant life from risks arising from the entry, establishment or spread of pests, diseases or disease carrying organisms;
• to protect human or animal life or health from risks arising from additives, contaminants, toxins or disease-carrying organisms in foods, beverages or foodstuffs;
• to protect human life or health from risks arising from diseases carried by animals, plants or products thereof, or from the entry, establishment or spread of pests; and
• to prevent or limit other damage from the entry, establishment or spread of pests.

**TBT Notifications**

These are primarily not related to health, but are related to matters such as trade, food composition and labelling.

**WTO Notification**

It is considered that the matters raised in this paper do not require a notification to the WTO due to the transitional nature of the regulations.

## 3 TRANSITIONAL ARRANGEMENTS

### 3.1 Background & Discussion

ANZFA proposed to review the Australian infant formula standard in 1993. It was hoped that this complex review would have been completed to be part of the joint *Australia New Zealand Food Standards Code*. Whilst significant efforts were made to develop a draft standard for infant formula that met the needs of industry whilst ensuring drivers for optimal
nutrition, it was not possible to reach final agreement on all issues before the draft joint Code was sent to Ministers for consideration. The standard will be finalised as soon as possible after the draft joint Code is adopted by the Ministerial Council.

ANZFA staff acknowledge the concerns of a number of public health and community organizations over infant formula issues. By temporarily withdrawing the draft standard 2.9.1 for further consideration, ANZFA believes that all future decisions will be made without undue haste, and that this approach best serves the public health interest of a vulnerable population group.

3.2 Proposed Arrangement

This Proposal involves the following changes to the draft joint Code –

The contents of Standard 2.9.1 has been removed and the Standard has been marked ‘Reserved’;

The “Transitional Standard for the Operation of the Food Standards Code and the Australia New Zealand Food Standards Code” has been amended such that for the purposes of infant formula, the provisions of the current Australian Food Standards Code apply. This essentially means that, irrespective of the introduction of the new joint Code, the status quo for infant formula applies, namely Standard R7 and other relevant provisions of the current Food Standards Code;

The Schedule contained in Standard 2.9.1 – Infant Formula Products – has been transferred to Standard 2.9.2. This is a necessary consequential amendment as Standard 2.9.2 referred, for its operation, to the Schedule in Standard 2.9.1, which, because of its excision from the draft Code, would be of no effect.

3.3 Alternative to Proposed Arrangement

The alternative to applying the current Food Standards Code exclusively to infant formula is to make no recommendation to the Ministerial Council on the matter. This would mean that, theoretically, infant formula manufacturers could produce the product according to the provisions within the current Food Standards Code or to applicable provisions in the joint Food Standards Code during the transitional period.

However, with the removal of Standard 2.9.1 and associated permissions for the product from the joint Code, manufacturers would be extremely limited in formulating the product. For example, relevant permissions for the addition of vitamins and minerals, and for food additives in infant formula would not be available under the joint Code. Theoretically, an unsafe product lacking the appropriate nutritional profile could be produced and sold as suitable for infant feeding.

Given the international nature of the industry, this alternative would lead manufacturers to make the product to the current Food Standards Code anyway. However, the provision for this outcome in the draft Transitional Standard as proposed in this Paper provides certainty and orderly transition. The alternative would involve the same outcome by a process of default to the current Code. The Proposal is also consistent with ANZFA’s approach to
similar matters such as Country of Origin and Health Claims provisions which have been referenced in the draft joint Code.

3.4 Regulatory Impact Statement

It is not considered necessary to prepare a Regulatory Impact Statement for this paper as this Proposal simply maintains the status quo for infant formula.

3.5 Public Consultation

Public comment is being sought over a two-week period on the proposed draft variations to the *Australian New Zealand Food Standards Code* discussed under 3.2, including any potential outcomes of temporarily withdrawing the draft standard 2.9.1 from the draft joint code. The purpose of this proposal is not to seek comment on Standard 2.9.2 other than the transferral of the Schedule in Standard 2.9.1 to Standard 2.9.2.
Transitional Standard for the Operation of the Food Standards Code and the Australia New Zealand Food Standards Code

Purpose
This Standard will operate from the time the joint Australia New Zealand Food Standards Code comes into effect until such time as both the (Australian) Food Standards Code and relevant regulations within the New Zealand Food Regulations 1984 are repealed. During this transitional period, this Standard requires that food either comply with the Australian Food Standards Code (Volume One) or with the joint Australia New Zealand Food Standards Code (Volume Two). In New Zealand, Volume One and Volume Two operate as alternatives to the New Zealand Food Regulations 1984. Therefore, for New Zealand purposes, food must comply with the New Zealand Food Regulations 1984 or Volume One or Volume Two, but not a combination of any two or three.
Manufacturers will need to choose which volume they wish to manufacture to for the food manufactured. Food may not comply with a combination of parts of Volume One, parts of Volume Two and, in New Zealand parts of the Food Regulations. It should be noted that, other than those Standards in Chapter 3 of Volume Two, which only apply in Australia, the requirement does not apply to the manufacturer but rather the food being manufactured. Therefore, if the manufacturer makes two kinds of food, this Standard allows one kind of food to be manufactured, say to Volume One requirements, and the other kind of food to Volume Two.

Table of Provisions

1 Interpretation
2 Transitional operation of Volume One and Volume Two

Clauses

1 Interpretation

Volume One means Volume One the Australia New Zealand Food Standards Code published under the name ‘Food Standards Code’ or, in the case of New Zealand, that Code other than Standard A14 and clauses (2) and (4) of Standard K2.

Volume Two means Volume Two of the Australia New Zealand Food Standards Code, published under the name ‘Australia New Zealand Food Standards Code’ or in the case of New Zealand, that Code other than Chapter 3.
2 Transitional operation of Volume One and Volume Two

(1) Food must comply with –

(a) Volume One; or
(b) Volume Two;

but not a combination of the both.

(2) Notwithstanding the operation of subclause (1) –

(a) food businesses and food handlers must comply with Chapter 3 of Volume Two; and
(b) food must comply with Standard A18 of Volume One; and
(c) for the purposes of infant formula products, Volume One exclusively applies.

(3) Paragraphs (2)(a) and (b) do not apply in New Zealand.

Editorial note:

In New Zealand, Volume One and Volume Two operate as alternatives to the New Zealand Food Regulations 1984. Therefore, for New Zealand purposes, food must comply with the New Zealand Food Regulations or Volume One or Volume Two, but not a combination of any two or three.
Standard 2.9.1
Infant Formula Products

This Standard is reserved.

Note:
Please refer to the “Transitional Standard for the Operation of the Food Standards Code and the Australia New Zealand Food Standards Code” which appears at the front of this Code. The effect of this Standard is to apply Standard R7 and other relevant Standards of the Australian Food Standards Code exclusively to infant formula, as a temporary arrangement.

The review of infant formula products being undertaken by ANZFA will be completed prior to the Australia New Zealand Food Standards Code becoming the sole Food Standards Code in Australia and New Zealand.
Standard 2.9.2
Foods for Infants

Purpose

This Standard provides for the compositional (including nutritional) and labelling requirements of foods intended and/or represented for use as food for infants. Foods in this Standard are intended to be fed to infants in addition to human milk and/or infant formula products. This Standard does not apply to Infant Formula Products, as they are regulated by Standard 2.9.1, nor does it apply to Formulated Meal Replacements and Formulated Supplementary Foods as they are regulated by Standard 2.9.3.

The Standard recognises the specific needs of infants relating to the texture of the food, the infant’s digestion ability, renal capacity and the need for high energy and nutrient intake to support rapid growth. This Standard recognises the particular microbiological and immunological susceptibility of infants including the potential for the development of food allergy.

General labelling requirements are contained in Part 1.2. Microbiological requirements are contained in Standard 1.6.1 – Microbiological Limits for Food.

This Standard amends the application of Standard 1.2.8 – Nutrition Information Requirements in relation to food for infants.

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2 General compositional requirements
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4 Additional compositional requirements for non-cereal-based foods
5 Labelling
6 Additional labelling requirements relating to specific nutrients and energy information
7 Representations
8 Claims about vitamins and minerals
9 Nutrition information
10 Food in dehydrated or concentrated form
11 Storage requirements
Schedule
Clausess

1 Interpretation

In this Standard –

**cereal-based food** means a food for infants that is based on cereal.

**ESADDI** means, for a vitamin or mineral in column 1 of Table 3 to clause 8, the estimated safe and adequate daily dietary intake specified for that vitamin or mineral in column 2.

**food for infants** means a food that is intended and/or represented for use as a source of nourishment for infants, but does not include –

(a) infant formula products; and
(b) formulated meal replacements; and
(c) formulated supplementary foods; and
(d) unprocessed fruit and vegetables.

**fruit-based food** means a food for infants that is based on fruit.

**infant** means a person up to the age of 12 months.

**infant formula product** means an infant formula product as defined in Standard 2.9.1.

**RDI** means, for a vitamin or mineral in column 1 of Table 2 to clause 8, the recommended dietary intake specified in relation to that vitamin or mineral in column 2 calculated and expressed in the form specified in the Table.

**sugars** includes honey.

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**Editorial note:**

Sugars is defined in Standard 2.8.1

2 General compositional requirements

(1) Food for infants must not contain a food additive or nutritive substance unless -

(a) expressly permitted by this Code; or
(b) the food additive or nutritive substance is naturally present in an ingredient of the food for infants.

(2) Food for infants may contain -

(a) sugars, provided in the case of a juice or a non-alcoholic beverage, the total sugars content of the food is no more than 4 g/100 g; and
(b) lactic acid producing cultures.

(3) Food for infants must not contain -

(a) more than 50 mg/100 g of total iron in cereal-based food on a moisture free basis; or

(b) honey, unless it has been treated to inactivate *Clostridium botulinum* spores; or

(c) more than the total quantity of sodium set out in column 2 of the Table to this paragraph for each particular type of food for infants; or

(d) added salt, in the case of ready-to-eat fruit-based foods including juices.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food Type</td>
<td>Maximum permitted quantity</td>
</tr>
<tr>
<td>Rusks</td>
<td>350 mg/100 g</td>
</tr>
<tr>
<td>Biscuits</td>
<td>300 mg/100 g</td>
</tr>
<tr>
<td>Flours, pasta, ready-to-eat foods for infants (including cereal-based foods other than rusks and biscuits)</td>
<td>100 mg/100 g</td>
</tr>
<tr>
<td>Ready-to-eat fruit-based foods, including juices</td>
<td>100 mg/100 g</td>
</tr>
</tbody>
</table>

(4) Food for infants intended for infants under the age of 6 months must be formulated and manufactured to a consistency that minimises the risk of choking.

Editorial note:
The intent of subclause (4) is to ensure that the food, except in the case of rusks, should have a texture that is soft and free of lumps.

3 Additional compositional requirements for cereal-based foods

(1) Cereal-based food for infants which contains more than 70% cereal, on a moisture free basis, and is promoted as suitable for infants over the age of 6 months -

(a) must contain no less than 20 mg iron/100 g on a moisture free basis; and

(b) may contain added thiamin, niacin, vitamin B<sub>6</sub>, vitamin C, folate, iron, magnesium in the permitted forms set out in Schedule 1 of this Standard; and

(c) may contain added vitamin C in the forms permitted in this Standard to a maximum level of 90 mg/100 g on a moisture free basis.
Cereal-based food for infants which contains more than 70% cereal, on a moisture free basis, and is promoted as suitable for infants from 4 months of age may contain added -

(a) iron in the permitted forms as set out in Schedule 1 of this Standard; and
(b) vitamin C in the forms permitted in Schedule 1 of this Standard to a maximum level of 90 mg/100 g on a moisture free basis.

4 Additional compositional requirements for non-cereal-based foods

Foods for infants other than cereal-based food for infants -

(a) in the case of juices and gels, must contain no less than 25 mg/100 g of vitamin C; and
(b) in the case of fruit-based foods, may contain vitamin C and/or folate in the permitted forms set out in Schedule 1 of this Standard.

5 Labelling

(1) This clause does not apply to packaged water.

(2) The label on a package of food for infants must not include a recommendation, whether express or implied, that the food is suitable for infants less than four months old.

(3) The label on a package of food for infants must include -

(a) a statement indicating the consistency of the food; and
(b) a statement indicating the minimum age, expressed in numbers, of the infants for whom the food is recommended; and
(c) where the food is recommended for infants between the ages of 4-6 months, in association with the statement required by paragraph (b), the words - “Not recommended for infants under the age of 4 months”; and
(d) where the added sugars content of the food for infants exceeds 4 g/100 g, the word - “sweetened”; and
(e) where honey has been used as an ingredient, in association with the word “honey, the word - “sterilised”.

Editorial note:

This Standard does not place limits on the use of sugars except for juices and non-alcoholic beverages.

Claims such as ‘no added sugar’, ‘sweetened’ or words of similar import are subject to the general labelling provisions.
6 Additional labelling requirements relating to specific nutrients and energy information

(1) Where a reference is made in the label on a package of food for infants to a food source of protein in the food, then the percentage of that food source of protein in the final food must be declared in the label.

Editorial note:
In this Standard, a reference to a food source of protein includes a reference in the name of the food to a source of protein. A food source of protein means milk, eggs, cheese, fish, meat, nuts and legumes. Meat includes poultry.

(2) Where a food for infants contains more than of 3 g/100 kJ of protein, the label on the package must include the words –

“Not suitable for infants under the age of 6 months”.

(3) A claim must not be made, whether express or implied, that a food for infants is a source of protein unless no less than 12% of the average energy content of the food is derived from protein.

Editorial note:
Average energy content is defined in Standard 1.2.8.

7 Representations

(1) A food must not be represented as being the sole or principal source of nutrition for infants.

(2) The label on a package of food for infants must not include a recommendation that the food can be added to bottle feeds of an infant formula product.

8 Claims about vitamins and minerals

(1) A claim must not be made, whether express or implied, in relation to a food for infants comparing the vitamin or mineral content of the food with that of any other food unless such a claim is expressly permitted elsewhere in this Standard.

(2) A claim, either express or implied, as to the presence of a vitamin or mineral in a food for infants may be made if the food contains in a normal serve at least 10% of the RDI as specified in Table 2 to this clause or at least 10% of the ESADDI as specified in Table 3 to this clause, for that vitamin or mineral.

(3) A claim, either express or implied, that a food for infants is a good source of a vitamin or mineral may be made if a reference quantity of the food contains at least 25% of the RDI as specified in Table 2 to this clause or at least 25% of the ESADDI as specified in Table 3 to this clause.
(4) A claim, whether expressed or implied, must not be made in relation to a fruit-based food for infants that the food contains more than -

(a) 60 mg/100 g of vitamin C; or
(b) 150 µg/100 g of folate.

(5) A claim must not be made, whether express or implied, in relation to a cereal-based food for infants to which a vitamin or mineral has been added, that the food contains in a normal serve that vitamin or mineral in a quantity greater than that specified in relation to that vitamin or mineral in column 2 of Table 1 to this clause.

Table 1 to clause 8
Maximum claims per serve for cereal-based foods for infants

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vitamins &amp; Minerals</td>
<td>Maximum claim per serve</td>
</tr>
<tr>
<td>Thiamin (mg)</td>
<td>15% RDI</td>
</tr>
<tr>
<td>Niacin* (mg)</td>
<td>15% RDI</td>
</tr>
<tr>
<td>Folate (µg)</td>
<td>10% RDI</td>
</tr>
<tr>
<td>Vitamin B₆ (mg)</td>
<td>10% RDI</td>
</tr>
<tr>
<td>Vitamin C (mg)</td>
<td>10% RDI</td>
</tr>
<tr>
<td>Magnesium (mg)</td>
<td>15% RDI</td>
</tr>
</tbody>
</table>

Table 2 to clause 8
Recommended Dietary Intake for infants

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vitamins &amp; Minerals</td>
<td>Specified RDI</td>
</tr>
<tr>
<td>Vitamin A</td>
<td>300 µg as retinol equivalents¹</td>
</tr>
<tr>
<td>Thiamin</td>
<td>0.35 mg</td>
</tr>
<tr>
<td>Riboflavin</td>
<td>0.6 mg</td>
</tr>
<tr>
<td>Niacin</td>
<td>3 mg as niacin²</td>
</tr>
<tr>
<td>Folate</td>
<td>75 µg</td>
</tr>
<tr>
<td>Vitamin B₆</td>
<td>0.45mg</td>
</tr>
<tr>
<td>Vitamin B₁₂</td>
<td>0.7 µg</td>
</tr>
<tr>
<td>Vitamin C</td>
<td>30 mg in total of L-ascorbic acid and dehydroascorbic acid</td>
</tr>
<tr>
<td>Vitamin D</td>
<td>5 µg cholecalciferol³</td>
</tr>
<tr>
<td>Vitamin E</td>
<td>4 mg alpha-tocopherol equivalents⁴</td>
</tr>
<tr>
<td>Vitamin K</td>
<td>10 µg phylloquinone</td>
</tr>
<tr>
<td>Calcium</td>
<td>550 mg</td>
</tr>
<tr>
<td>Iodine</td>
<td>60 µg</td>
</tr>
</tbody>
</table>
Iron 9 mg, in the case of infants from 6 months
Iron 3 mg, in the case of infants under 6 months
Magnesium 60 mg
Phosphorus 300 mg
Selenium 15 μg
Zinc 4.5 mg

# - These figures represent US Adequate Intake Levels

<table>
<thead>
<tr>
<th>Vitamins &amp; Minerals</th>
<th>Specified ESADDI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biotin# (μg)</td>
<td>6</td>
</tr>
<tr>
<td>Pantothenic Acid (mg)#</td>
<td>1.8</td>
</tr>
<tr>
<td>Copper (mg)</td>
<td>0.65</td>
</tr>
<tr>
<td>Manganese (mg)</td>
<td>0.8</td>
</tr>
<tr>
<td>Chromium (μg)</td>
<td>40</td>
</tr>
<tr>
<td>Molybdenum (μg)</td>
<td>30</td>
</tr>
</tbody>
</table>

# - These figures represent US Adequate Intake Levels

9 Nutrition information

(1) The following provisions of Standard 1.2.8 do not apply to this Standard -

(a) paragraph 3(j); and
(b) paragraphs 3(c), (d), (e) and (f); and
(c) subclause 5(2); and
(d) clause 7; and
clause 8; and
clause 9; and
(g) subclause 17(2).

(2) In addition to the requirements of clause 5 of Standard 1.2.8, the nutrition information panel on a label on a package of food for infants must include the total sugars content.

(3) The nutrition information panel for food for infants must be set out in the following format –
### NUTRITION INFORMATION

<table>
<thead>
<tr>
<th></th>
<th>Quantity per Serving</th>
<th>Quantity per 100g</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(g (or mL))</td>
<td>(or 100 mL)</td>
</tr>
<tr>
<td>Energy</td>
<td>kJ (Cal)</td>
<td>kJ (Cal)</td>
</tr>
<tr>
<td>Protein</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>Fat, total</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>- claimed fatty acids</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>Carbohydrate, total</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>- sugars</td>
<td>g</td>
<td>g</td>
</tr>
<tr>
<td>(here insert any other nutrient, or biologically active substance, to be declared)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 10 Food in dehydrated or concentrated form

The label on a package of food in dehydrated or concentrated form, must include directions as to how the food should be reconstituted, and the particulars set out in each column of the panel expressed as a proportion of the food as so reconstituted.

**Editorial note:**

If manufacturers nominate more than one fluid for preparing the food, the particulars set out in the column should be according to the first liquid nominated and a note to this effect made.

#### 11 Storage requirements

The label on a package of food for infants must contain storage instructions covering the period after it is opened.

**Editorial note:**

Standard 1.2.4 – Labelling of Ingredients applies to this Standard with the exception of paragraph 6(1)(a) – declaration of compound ingredients.
## Schedule 1

**Permitted Forms of Vitamins and Minerals in Infant Formula Products**

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vitamins or minerals</strong></td>
<td><strong>Permitted Forms</strong></td>
</tr>
</tbody>
</table>
| Vitamin A | Retinol Forms  
vitamin A (retinol)  
vitamin A acetate (retinyl acetate)  
vitamin A palmitate (retinyl palmitate)  
retinyl propionate  
Carotenoid Forms  
beta-carotene |
| Vitamin C | L-ascorbic acid  
L-ascorbyl palmitate  
calcium ascorbate  
potassium ascorbate  
sodium ascorbate |
| Vitamin D | vitamin D<sub>2</sub> (ergocalciferol)  
vitamin D<sub>3</sub> (cholecalciferol)  
vitamin D (cholecalciferol-cholesterol) |
| Thiamin | thiamin hydrochloride  
thiamin mononitrate |
| Riboflavin | riboflavin  
riboflavin-5'-phosphate, sodium |
| Niacin | niacinamide (nicotinamide) |
| Vitamin B<sub>6</sub> | pyridoxine hydrochloride  
pyridoxine-5'-phosphate |
| Folate | folic acid |
| Pantothenic acid | calcium pantothenate  
Dexpanthenol |
| Vitamin B<sub>12</sub> | Cyanocobalamin  
Hydroxocobalamin |
| Biotin | d-Biotin |
| Vitamin E | dl-α-tocopherol  
d-α-tocopherol concentrate  
tocopherols concentrate, mixed  
d-α-tocopheryl acetate  
dl-α-tocopheryl acetate |
<table>
<thead>
<tr>
<th>Vitamin K</th>
<th>vitamin K₁, as phylloquinone (phytonadione) phytylmenoquinone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calcium</td>
<td>calcium carbonate calcium chloride calcium citrate calcium gluconate calcium glycerophosphate calcium hydroxide calcium lactate calcium oxide calcium phosphate, dibasic calcium phosphate, monobasic calcium phosphate, tribasic calcium sulphate</td>
</tr>
<tr>
<td>Chloride</td>
<td>calcium chloride magnesium chloride potassium chloride sodium chloride</td>
</tr>
<tr>
<td>Chromium</td>
<td>chromium sulphate</td>
</tr>
<tr>
<td>Copper</td>
<td>copper gluconate cupric sulphate cupric citrate</td>
</tr>
<tr>
<td>Iodine</td>
<td>potassium iodate potassium iodide sodium iodide</td>
</tr>
<tr>
<td>Iron</td>
<td>ferric ammonium citrate ferric pyrophosphate ferrous citrate ferrous fumarate ferrous gluconate ferrous lactate ferrous succinate ferrous sulphate</td>
</tr>
<tr>
<td>Magnesium</td>
<td>magnesium carbonate magnesium chloride magnesium gluconate magnesium oxide magnesium phosphate, dibasic magnesium phosphate, tribasic magnesium sulphate</td>
</tr>
<tr>
<td>Manganese</td>
<td>manganese chloride</td>
</tr>
<tr>
<td>Element</td>
<td>Compounds</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Molybdenum</td>
<td>manganese gluconate</td>
</tr>
<tr>
<td></td>
<td>manganese sulphate</td>
</tr>
<tr>
<td></td>
<td>manganese carbonate</td>
</tr>
<tr>
<td></td>
<td>manganese citrate</td>
</tr>
<tr>
<td></td>
<td>sodium molybdateVI dehydrate</td>
</tr>
<tr>
<td>Phosphorus</td>
<td>calcium glycerophosphate</td>
</tr>
<tr>
<td></td>
<td>calcium phosphate, dibasic</td>
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<tr>
<td></td>
<td>calcium phosphate, monobasic</td>
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<tr>
<td></td>
<td>calcium phosphate, tribasic</td>
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<tr>
<td></td>
<td>magnesium phosphate, dibasic</td>
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<tr>
<td></td>
<td>potassium phosphate, dibasic</td>
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<tr>
<td></td>
<td>potassium phosphate, monobasic</td>
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<tr>
<td></td>
<td>potassium phosphate, tribasic</td>
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<tr>
<td></td>
<td>sodium phosphate, dibasic</td>
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<tr>
<td></td>
<td>sodium phosphate, monobasic</td>
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<tr>
<td></td>
<td>sodium phosphate, tribasic</td>
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<tr>
<td>Potassium</td>
<td>potassium bicarbonate</td>
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<tr>
<td></td>
<td>potassium carbonate</td>
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<tr>
<td></td>
<td>potassium chloride</td>
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<tr>
<td></td>
<td>potassium citrate</td>
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<tr>
<td></td>
<td>potassium glycerophosphate</td>
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<tr>
<td></td>
<td>potassium gluconate</td>
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<tr>
<td></td>
<td>potassium hydroxide</td>
</tr>
<tr>
<td></td>
<td>potassium phosphate, dibasic</td>
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<tr>
<td></td>
<td>potassium phosphate, monobasic</td>
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<tr>
<td></td>
<td>potassium phosphate, tribasic</td>
</tr>
<tr>
<td>Selenium</td>
<td>sodium selenite</td>
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<tr>
<td></td>
<td>seleno methionine</td>
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<tr>
<td>Sodium</td>
<td>sodium bicarbonate</td>
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<tr>
<td></td>
<td>sodium carbonate</td>
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<tr>
<td></td>
<td>sodium chloride</td>
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<td></td>
<td>sodium chloride iodized</td>
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<tr>
<td></td>
<td>sodium citrate</td>
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<tr>
<td></td>
<td>sodium gluconate</td>
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<tr>
<td></td>
<td>sodium hydroxide</td>
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<tr>
<td></td>
<td>sodium iodide</td>
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<tr>
<td></td>
<td>sodium lactate</td>
</tr>
<tr>
<td></td>
<td>sodium phosphate, dibasic</td>
</tr>
<tr>
<td></td>
<td>sodium phosphate, monobasic sodium phosphate, tribasic sodium sulphate sodium tartrate</td>
</tr>
<tr>
<td>------------</td>
<td>------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Zinc</td>
<td>zinc acetate, zinc chloride, zinc gluconate, zinc oxide, zinc sulphate</td>
</tr>
</tbody>
</table>