

20/10/2021

Food Standards Australia New Zealand
via electronic submission



Tēnā koe

This submission is lodged in response to the Consultation paper 3 – Regulatory framework and definitions Proposal P1028 – Infant Formula

Woolworths New Zealand Limited operates 180 Countdown supermarkets, two Metros, and three “eStores” across Aotearoa New Zealand, serving over 2.5 million customers every week.

As a retailer it is our aim to provide our customers convenient access to affordable food and household consumer goods. We have no comments to make on the majority of your consultation paper 3 with the sole exception of 5.3.3 Restriction on sale:

5.3.3 Restriction on sale

To be consistent with the risk management strategy established for Standard 2.9.5, FSANZ considers that a restriction on sale should be imposed on IFPSDU. On this basis, another principle is:

- *IFPSDU should be subject to a restriction on sale.*

Woolworths New Zealand supports a restriction of sale for the highly specialised IFPSDU products however does not support a restriction of sale for less specialised products that cater for the transient gastroenterological conditions. These products need to be conveniently available, at an affordable price, for caregivers that may require such a temporary change of diet following advice from their medical practitioner.

We would support differentiation of these less specialised, and thereby lower risk, IFPSDU as a subset of the wider IFPSDU category, and if required would support additional controls on their sale short of restriction to Pharmacy only sales channels, as we do not believe this would serve the community’s needs given these products are also safe for healthy infants.

Regards

