

11th September 2020

Food Standards Australia New Zealand
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Submission Re – P1054: Pure and highly concentrated caffeine products

[REDACTED] Sports Dietitians Australia's (SDA) previous submission (12th November 2019) to express serious concerns that the proposal in its current form poses a sense of safety for consumers. Whilst restricting the caffeine content of capsules to >33% of product is welcomed; we have maintained the conclusion that bulk powder or caffeine powders and other solid products containing ≤5% caffeine, are '*not considered to pose an unacceptably high risk to consumers*' (as detailed in the FSANZ Risk and technical assessment).

At present, a ≤5% caffeine threshold would not reduce the caffeine content of popular pre-workout supplements (PWS) used by Australian consumers¹. Yet, PWS have been directly linked to serious health complications² and death³. When establishing a threshold dose, we believe consideration of possible consumer behaviour and/or factors that influence acute use/misuse is critical. In contrast to caffeine from sources such as coffee, PWS use is more akin to other sports supplements (e.g. protein powders). That is, quantities are self-regulated via manufacturer's scoops (scoops range 3-20g/serve) and products are typically sweetened (probably in response to the caffeine - a bitter tastant).

As cited in a FSANZ commissioned report by Desbrow et al, (2018); of 243 participants who currently or previously used pre-workout supplements; approximately one third (73 (30%)) indicated having access to ≥2 PWS varieties at one time, with 6% (n=14) of users indicating they would combine PWS as a single bolus. Furthermore, 66 (27%) of these individuals reported experiencing health concerns or unintended effects from taking a PWS. Of these, ~50% (n=36) immediately stopped taking the PWS, while 16 (24%) continued to take the PWS despite health concerns or side effects and the remainder (n=14 (21%)) switched to another brand. SDA believes that stricter regulation is necessary to accommodate irresponsible consumers, and to protect the health and safety within our most vulnerable population groups including junior/younger individuals.

Again, there is no ergogenic reason for caffeine levels in bulk powders to be >2%, given maximal performance benefits are usually achieved at caffeine intakes of 3-6mg/kg of body mass⁴. Indeed, larger caffeine doses (>9mg/kg/BM) do not appear to increase performance⁴.

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SDA therefore recommends the revised maximum limit for all foods be 2% concentration and that caffeine supplementation for sports is conducted under the guidance of an Accredited Sports Dietitian.

We look forward to understanding more about the outcome for caffeinated sports foods including strips, gels and chewables, as we understand these will be formally addressed in the FSANZ Standard 2.9.4 – Formulated supplementary sports foods review.

If you require any clarification or information, please contact [REDACTED] at [REDACTED] or mobile [REDACTED].

Yours sincerely,

[REDACTED]

Executive Officer

References:

1. Desbrow B, Hall S, O'Connor H, Slater G, Barnes K, Grant G. Caffeine content of pre-workout supplements commonly used by Australian consumers. *Drug Test Anal.* 2018.
2. Harris BF, Winn C, Ableman TB. Hemorrhagic Stroke in a Young Healthy Male Following Use of Pre-Workout Supplement Animal Rage XL. *Mil Med.* 2017;182(9):e2030-e2033.
3. Andrade A, Sousa C, Pedro M, Fernandes M. Dangerous mistake: an accidental caffeine overdose. *BMJ case reports.* 2018;2018.
4. Maughan RJ, Burke LM, Dvorak J, et al. IOC consensus statement: dietary supplements and the high-performance athlete. *Br J Sports Med.* 2018;52(7):439-455.