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20 February 2003

**ENTERED IN  
DATA BASE****ACKNOWLEDGED**

Project Officer  
Application A424  
Food Standards Australia New Zealand  
PO Box 10559  
WELLINGTON 6036

PH36-28 242

Dear Sir/Madam

**Proposal 242– Foods for Special Medical Purposes**

New Zealand supports in principle the development of a standard for Foods for Special Medical Purposes (FSMP). We consider, however, that any such standard should not be unduly prescriptive. In our view, the likelihood is that FSMP products would be administered by an appropriate health professional and not therefore readily available to the general public. In such circumstances, the standard should reflect use by professionals and provide for greater flexibility in provisions.

For many of these products, which are mostly produced off-shore, the market in New Zealand and Australia is small and it is important we do not risk having important products withdrawn from the market.

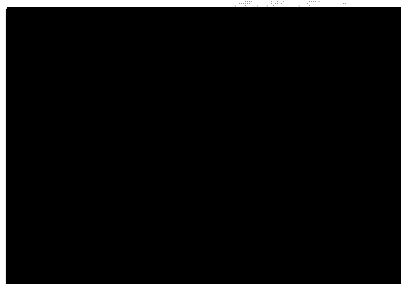
In determining the composition of FSMP, New Zealand questions the benefit of having prescriptive compositional requirements for these products unless there are specific issues of safety concern. New Zealand therefore supports the risk based approach outlined in P242 and supports upper limits of nutrients only being used where there is a health risk with excess consumption.

New Zealand also supports the minimum composition requirements where a product is considered a complete nutritional product.

The labelling requirements proposed appear quite onerous and although the information required is sound for a general purpose food, New Zealand questions the impact of such requirements on the industry for small ranges of highly specialised products. Such concern may be better considered once a full response is received from industry and other groups on the labelling, but New Zealand supports more detailed analysis of the costing provided by industry and the likely cost and benefits of such labelling requirements being undertaken.

Thank you for the opportunity to comment.

Yours sincerely



Director  
Policy and Regulatory Standards (Labelling & Composition)