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File Ref: QCOS/32901

25 October 2018

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1102 – Addition of L-carnitine 1158 to food

Thank you for the opportunity to provide comments on the call for submissions paper for Application A1102.

This response provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Concern is raised of the intention to vary the Food Standards Code to permit the use of L-carnitine in formulated supplementary sports foods at the proposed 2 g per one-day amount. It is noted in the Call for Submissions report that maximum intake is 3 g per day. However, it is common for people consuming sports supplement to take multiple supplements which could lead to some people exceeding the maximum intake of 3 g per day. The dietary exposure assessment may need to be revised to consider the potential for consumers to consume multiple products, including therapeutic goods and complementary medicines, that may contain L-carnitine.

Consideration may need to be given to additional safety measures, such as the mandatory inclusion of an advisory statement on labels advising of the maximum recommended intake of L-carnitine from all sources should the maximum amount of L-carnitine permitted in formulated supplementary sports foods be increased. This is because there is the potential for the public to purchase and consume L-carnitine from a variety of sources including other foods and products high in L-carnitine that are regulated by therapeutic goods or complementary medicines requirements.

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Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Branch, Queensland Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

Food Safety Standards and Regulation Unit
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