

# A1230 Very Low Energy Diet (VLED) products

Response to consultation  
December 2021

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8000 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for food and nutrition for healthier people and healthier communities.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in the food system to support consumers to identify healthier food options and companies with product formulation, marketing, consumer education and compliance.

This submission was prepared following the [Conflict of Interest Management Policy](#) and process approved by the Board of Dietitians Australia. Dietitians Australia members have wide ranging expertise in areas including public health, food industry, research and bariatric surgery.

## Feedback

### Definition

*Consultation paper section 2.2.2.1; Draft variation Standard 1.1.2–2(3)*

**very low energy diet** means a range of food for special medical purposes specially formulated for the dietary management of overweight and obesity and which provide the sole source of nutrition when consumed according to the directions for use on the label.

The drafted definition of ‘very low energy diet’ (VLED) implies that the diet includes only the specially formulated products and does not explicitly recognise that typically a VLED diet is two or three meal replacements (eg shake or bar) per day plus 2 cups of low-carbohydrate vegetables and a teaspoon of vegetable oil. Our concern is that defining VLED products as appropriate as a sole source of nutrition misrepresents the products because they are typically consumed along with a restricted range of whole foods (ie 2 cups low-carbohydrate vegetables and 1 teaspoon vegetable oil).

Dietitians Australia recommends the proposed definition is amended to replace ‘sole’ with ‘primary’.

### Labelling Requirements

We strongly support that labelling requirements for foods for special medical purposes (FSMP) be applied to VLED products. Contraindication statements for VLEDs must clearly state that they are not appropriate for use by minors or pregnant people, or by any other adult who is not using the product under the care of a medical doctor or Accredited Practising Dietitian.

We recommend that product labels are required to clearly state if the products are designed to be consumed as part of a program including 2 cups of vegetables and 1 teaspoon of vegetable oil, rather than as a ‘sole source of nutrition’ which implies only the formulated products are required for a VLED program.