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## Submission

Beston Global Foods (and subsidiaries/trading names – Beston Pure Dairies Pty Ltd, Beston Pure Foods) have a manufacturing facility in Jervois, South Australia. We produce lactoferrin from skim milk and supply approximately 5% of the world production of lactoferrin. Production for 2023 FY is estimated to be 14 – 18 metric tonnes. We sell this domestically and predominantly internationally. Internationally it is supplied for use in infant formula in China and other countries.

1. General Proposal
  - a. Beston Global foods is generally supportive of the aim of application A1253 Bovine Lactoferrin in Infant Formula
    - i. It is accepted as an ingredient in infant formula in China and the EU and therefore we are of the opinion it should be allowed as an ingredient in Australian infant formula
2. Exclusivity
  - a. Beston is of the strong opinion that no company should have exclusivity. Lactoferrin is a long established and commonly added ingredient to infant formula in all advanced formula markets. There is no unique IP, nor value, nor unique market position or investment inherent in the standard proposed. This standard should be non exclusive.
3. Specification
  - a. The majority of the Food Standards Code only contains specific specification for microbiology and food safety issues. Beston could not support having a specification for lactoferrin that included compositional parameters and test methods. There is no worldwide standard method for testing lactoferrin purity. The majority of manufacturers will use the China GB methods because China is the largest market. However Australian manufacturers should not be restricted to a test method.

- b. The same applies for iron levels. Beston do not believe this is a food safety issue so iron content should be a business to business decision between manufacturer and customer and not legislated.
  - c. Specific references to heavy metals again does not reflect the remainder of the Food Standards Code where heavy metals are specifically covered by Schedule 19. Most Australian Dairy Manufacturers reference the annual AMRA survey conducted by DAFF and this is accepted by international customers as verification of the Australian industry.
4. Addition amount
- a. As Beston supply predominantly to the export opinion we are of the firm opinion that ,maximum allowable should be equivalent of the major overseas markets of China, Japan, EU.



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