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BioCeuticals Ltd Submission -
FSANZ Consultation: Proposal P1030
Health Claims -
Formulated Supplementary Sports Foods and Electrolyte Drinks

BioCeuticals is Australia's leading provider of nutritional and therapeutic supplements. Renowned for manufacturing and delivering high quality foods for specific nutritional purposes and integrative medicines to healthcare practitioners, BioCeuticals aims to consistently raise the standards of natural-based therapies.

With quality, innovation and integrity as guiding principles, BioCeuticals is at the forefront of ensuring complementary and alternative medicines (CAMs) become an integral part of the Australian allied healthcare industry.

BioCeuticals has a strong commitment to research, functional formulas and reliable practitioner support. Our supplements are recognised by qualified healthcare practitioners as well as patients; a fact that reflects our reputation as a progressive force in integrative health.

BioCeuticals has been advocating for reform relating to food and nutrition health claims for many years and we welcome the opportunity to contribute to the Consultation for Health Claims for Formulated Supplementary Sports Foods and Electrolyte Drinks.

Following a review of Proposal P1030 pertaining to Standard 2.6.2 (Non-Alcoholic Beverages and Brewed Soft Drinks) and 2.9.4 (Formulated Supplementary Sports Foods), we would like to provide the following feedback.

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2.2 Electrolyte Drinks

2.2.1 Definition

The proposed new definition of an 'electrolyte drink' means *a drink formulated for the rapid replacement of fluid, carbohydrates and electrolytes lost as a result of sustained strenuous physical activity.*

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We suggest that the word 'strenuous' be removed from the definition, as replacement of fluid, carbohydrates and electrolytes can be required following sustained physical activity that may be of moderate intensity depending on a number of factors.

These factors include reduced fitness levels of participant/s, moderate intensity activity being performed for an extended period of time, and exercise of lower intensities being done in certain environmental conditions (e.g. high humidity).^{1,2}

Alternatively, we suggest that a definition of 'strenuous physical activity' is included in the updated version of Standard 2.9.4.

Purpose - p 16

This section states that *'Due to the particular physiological demands of sports people, this Standard provides for the addition to formulated supplementary sports foods of certain micronutrients and other ingredients which are not permitted to be added to other foods. This means that such products are not suitable for consumption by children.'*

Given that many children regularly participate in physical activity and exercise and in certain instances may benefit from replacement of fluid, carbohydrates and electrolytes, we think in the interest of clarity and safety that the specific age below which such products are not suitable for consumption is specified in the updated version of Standard 2.9.4.

Interpretation (1)

An electrolyte drink base is defined as *'a solid or liquid which when made up, makes up an electrolyte drink'*.

We suggest clarification if this definition includes gels as an electrolyte drink base. Alternatively we would like there to be consideration of an additional subcategory for electrolyte gels.

Other

We have also noted that Standard 2.9.4 is absent from Standard 1.2.7 - Health Claims; following finalisation of the changes to Standard 2.9.4 from Proposal P1030, will Standard 2.9.4 be included in the Health Claims Standard 1.2.7 as currently it is absent from Schedule 1 (p21).

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1. American College of Sports Medicine and American Dietetic Association of Canada. **Joint Position Statement: Nutrition and Athletic Performance. Med Sci Sports Exer, 2009; 41 (3): 709-731.**
2. American College of Sports Medicine. **Position Stand: Exercise and Fluid Replacement. Med Sci Sports Exerc. 2007; 39 (2): 377-390.**

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