

submissions

From: [REDACTED]
Sent: Tuesday, 30 September 2014 5:59 PM
To: submissions
Subject: FSANZ Proposal P1030.

Dear Mr. McCutcheon,

Thank you for the opportunity to comment on FSANZ Proposal P1030.

Sukkie Pty. Ltd does not support the proposed labelling changes to the Food Standard Code (the Code) for Formulated Supplementary Sports Foods & Electrolyte Drinks

Most sports drinks are unsafe for human consumption:

It is our view that due to high concentration of acid, most sports drinks and soft drinks are not safe for human consumption. This view is supported by the dental profession and scientific evidence.

The proposed changes will permit sports drink companies to further embellish the benefits of their products with no regard for the perfectly legal, but scientifically accepted fact that they have the potential to cause irreversible dental erosion.

By permitting companies to further promote ergogenic benefits based on the inclusion of an ingredient without any labelling requirement to promote the presence of (pH levels are not currently required) and impacts caused by another ingredient is grossly unethical.

The proposed change impacts at risk consumers:

The inclusion of health claims permits more powerful marketing by sports drinks companies potentially furthering the uptake by those at risk members of the community such as children. To use an example given to the media by [REDACTED] the Beverages Council of a potential claim that could now be made that 'Sports drinks hydrate better than water', gives us great concern. Sports drinks may be designed with the athlete in mind however are being increasingly bought consumed by at risk consumers such as children and non athletes.

- o Children as young as three consume sports drinks for sport (FSANZ, 2010)
- o Approximately 80 per cent of 12- to 17-year-old school children in Victoria consumed sugar-containing soft drinks (NJ Cochrane et al. 2009).
- o Nearly 70% of Australian kids having dental erosion in at least one tooth caused in part by drinking acidic drinks like sports drinks (S Kazoullis, 2007)

Best regards

[REDACTED] | **Head Hydrator | Sukkie Pty Ltd**
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Sukkie. If you are an athlete with teeth, this sports drink is for you.