

COVER SHEET FOR SUBMISSIONS

P1030 Health Claims – Formulated Supplementary Sports foods & Electrolyte Drinks
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DETAILS FOR PUBLICATION	
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Response to Proposal P1030 Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks

Australian dairy is a \$13 billion farm, manufacturing and export industry.

Dairy Australia is the dairy industry owned service organisation, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation.

The Australian Dairy Industry appreciates the opportunity to comment on Proposal P1030 Health Claims – Formulated Supplementary Sports Foods & Electrolyte drinks.

The overall proposal is supported by the Australian Dairy Industry in that the proposal provides consistency within the Food Standards Code and consistency with international standards. We also would like to draw to the attention of FSANZ current issues with communicating evidence based sport and rehydration benefits of dairy foods/beverages and dairy ingredients, and seek further engagement with FSANZ on how these issues may best be addressed within the Food Standards Code Health Claims framework and ongoing review of standards including those under standard 2.9

Health claims permissions consistent with their respective intended purpose and in accordance with Standard 1.2.7 – Nutrition, Health and Related Claims

The Australian Dairy Industry supports the proposed changes to permit formulated supplementary sports foods, electrolyte drinks & electrolyte drink bases to carry health claims consistent with purpose, including pre- approved claims and self – substantiation, and consistent between domestic and international food standards. From a trade perspective, this removes a potential barrier to internationally traded formulated supplementary foods and electrolyte drinks.

Transfer the regulation of electrolyte drinks from Standard 2.6.2 – Non-Alcoholic Beverages and Brewed Soft Drinks to Standard 2.9.4 – Formulated Supplementary Sports Foods

The transfer of regulation of electrolyte drinks from Standard 2.6.2 to Standard 2.9.4 and the proposed definition to clearly recognise these drinks for use in sports as opposed to lifestyle drinks is supported. This is consistent with health promotion messages that these drinks are only required for intense exercise.

Proposed definition of electrolyte drinks – a drink formulated for the rapid replacement of fluid, carbohydrates and electrolytes lost as a result of sustained strenuous physical activity

The Australian Dairy Industry requests that FSANZ consider there are general foods such as milks, cheeses and yoghurts that can also provide the same benefits consistent with purpose of electrolyte drinks & formulated supplementary foods. There should be the ability to communicate the body of evidence that milk based drinks provide a superior/equivalent effect treating mild dehydration in comparison to electrolyte drinks and may be of use before, during and after exercise and not require to meet the NPSC requirements. These general foods, are healthy nutritious Australian Dietary Guideline ‘core’ foods which are suitable for the whole population including children and pregnant women and do not require advisory statements of this nature. However these foods are eminently suitable for those undertaking intense exercise. We seek further engagement with FSANZ regarding how these products when used/promoted for use in sustained strenuous physical activity can be best managed within the Health Claims framework, and request this issue is also considered in further reviews of Formulated Supplementary Sports Food & Electrolyte Drinks standards.

Example evidence to demonstrate milk and flavoured milk are foods which can similarly assist sports people in achieving nutritional or performance goals (as are formulated supplementary sports foods)(relevant claims under Standard 2.9.4 ‘useful before, during or after strenuous exercise’; appropriate usage may assist in the provision of energy in the form of carbohydrate’:

- *The combination of carbohydrates, proteins and electrolytes in plain and flavoured milk make them suitable choices to help replenish fuel stores after a workout¹ as well as rehydrating² and repairing muscles.³*
- *Studies have shown the effectiveness of chocolate milk in promoting post-exercise glycogen resynthesis^{4, 5} or restoring and supporting exercise performance following an earlier intense bout of exercise.^{6, 7, 8}*

The Australian dairy industry recognises that this proposal is an interim arrangement pending the review of std 2.9.4 and request that the review of std 2.9.4 include:

- review of specified sugars for electrolyte drinks and inclusion of lactose as specified sugar (low GI sugar – provides sustained energy release, contributes to treating mild dehydration);
- consider inclusion of protein fractions to enhance rehydration effect in line with evidence for milk based drinks & treating mild dehydration

The current literature supports that dairy proteins and lactose can play a role in enhanced treatment of mild dehydration. We note that electrolyte drinks currently do not include permissions for lactose or proteins. We suggest that FSANZ consider including permissions for lactose and appropriate proteins reflecting current evidence when preparing the proposal for the review of standard 2.9.4

Example evidence summary to demonstrate milk and flavoured milk are foods which can be consumed for the rapid replacement of fluid, carbohydrates and electrolytes lost as a result of sustained strenuous physical activity (as are electrolyte drinks):

- *Milk, and milk-based beverages have been shown to be as effective⁹, if not more effective^{10, 11, 12} than electrolyte drinks in restoring fluid balance after exercise. This evidence relates to adults engaged in intense exercise, often in the heat, comparing milk to commercially available electrolyte drinks.*
- *A study in children has similarly demonstrated that milk is as effective as an electrolyte drink in replacing fluid losses after exercise induced dehydration in the heat.¹³*
- *Milk, flavoured milk and milk-based beverages provide a source of fluid, carbohydrate and sodium within the requirements set for the composition of electrolyte drinks and electrolyte drink bases under standard 2.6.2. The sodium concentration of milk is similar to conventional sports drinks and fluid retention is aided by the high potassium and protein content.^{14 15} For example skim milk contains 52 g/L carbohydrates and 21 mmol/L*

¹ Thomas K1, Morris P, Stevenson E. (2009) Improved endurance capacity following chocolate milk consumption compared with 2 commercially available sport drinks. *Appl Physiol Nutr Metab*. 34(1):78-82.

² Shirreffs, SM et al., (2007) Milk as an effective post-exercise rehydration drink. *British Journal of Nutrition*, 98 (1); 173-80

³ Lunn WR, Pasiakos SM, Colletto MR, et al. Chocolate milk and endurance exercise recovery: protein balance, glycogen, and performance. *Med Sci Sports Exerc* 2012; 44(4): 682-91

⁴ Lunn WR, Pasiakos SM, Colletto MR, et al. Chocolate milk and endurance exercise recovery: protein balance, glycogen, and performance. *Med Sci Sports Exerc* 2012; 44(4): 682-91

⁵ Ferguson-Stegall L, McCleave EL, Ding Z, et al. Postexercise carbohydrate-protein supplementation improves subsequent exercise performance and intracellular signaling for protein synthesis. *J Strength Cond Res* 2011;25(5): 1210-1224

⁶ Thomas K, Morris P, Stevenson E. Improved endurance capacity following chocolate milk consumption compared with 2 commercially available sport drinks. *Appl Physiol Nutr Metab* 2009; 34(1): 78-82

⁷ Karp JR, Johnston JD, Tecklenburg S, et al. Chocolate milk as a post-exercise recovery aid. *Int J Sport Nutr Exerc Metab* 2006; 16(1): 78-91

⁸ Spaccarotella KJ, Andzel WD. The effects of low fat chocolate milk on postexercise recovery in collegiate athletes. *J Strength Cond Res* 2011; 25(12):3456-3460

⁹ Watson, P et al., (2008) A comparison of the effects of milk and a carbohydrate-electrolyte drink on the restoration of fluid balance and exercise capacity in a hot, humid environment. *European Journal of Applied Physiology*, 104 (4); 633-42.

¹⁰ Spaccarotella KJ, Andzel WD. The effects of low fat chocolate milk on postexercise recovery in collegiate athletes. *J Strength Cond Res* 2011; 25(12):3456-3460

¹¹ Shirreffs, SM et al., (2007) Milk as an effective post-exercise rehydration drink. *British Journal of Nutrition*, 98 (1); 173-80.

¹² Desbrow, B et al., (2014) Comparing the rehydration potential of different milk based drinks to a carbohydrate-electrolyte beverage. *Applied Physiology, Nutrition and Metabolism*, doi: 10.1139/apnm-2014-0174

¹³ Volterman K et al. Children and Exercise XXVII: The Proceedings of the XXVIIth International Symposium of the European Group of Paediatric Work Physiology 2011; Chapter 13: 101-105.

¹⁴ Shirreffs SM, Watson P, Maughan RJ. Milk as an effective post-exercise rehydration drink. *Brit J Nutr* 2007; 98(1):173-180.

*sodium; flavoured milk (reduced fat) contains 83 g/L carbohydrate and 30 mmol/L sodium.*¹⁶

Dairy Australia can make available to FSANZ further relevant literature/evidence regarding dairy foods and sporting performance and hydration for consideration to assist further work on this issue.

Less than one year transition period dependent on Code Review. The Code will have to be amended to capture this proposal post new Code commencement.

Alignment between the Code Review and this proposal would be a better outcome.

¹⁵ Thomas K, Morris P, Stevenson E. Improved endurance capacity following chocolate milk consumption compared with 2 commercially available sport drinks. *Appl Physiol Nutr Metab* 2009; 34(1): 78-82

¹⁶ FSANZ NutTab 2010