

I am writing regarding Food Standards Australia and New Zealand (FSANZ) Proposal P1030: Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks.

I have a number of concerns regarding this proposal and would like to relay them here as a member of the public but also as a General Practitioner who struggles to deal with an out of control obesity epidemic.

**1. Concerns regarding the definitions used, including -**

- i. Regarding formulated supplementary sports foods (FSSF):
  - What is a "sports person"?
  - What is meant by "achieving specific nutritional or performance goals"?
- ii. Regarding the electrolyte drinks (ED):
  - What do you mean by "rapid" replacement?
  - What do you mean by "sustained strenuous physical activity"?

Evidently, without appropriate definitions, how can one apply the so called evidence that Geoff Parker from FSANZ spoke of only this morning on ABC news breakfast. How is a member of the public able to apply the information to their own situation if you don't define the terms of reference. The most obvious example here is 'strenuous exercise' - will a mother who takes her child to the swimming carnival know whether her child is doing 'strenuous' exercise? Geoff Parker gave an example of his own 13 year old and suggested for most activity water would be the right choice (will this be on the label??), but if he were doing a 10 Km run with his child, then a sports drink would probably be appropriate. I would probably agree, if the child was actually running! But at what level of intensity / distance do we say - yes, okay, it might be alright to have a bit of sugar?

Too often children are using sports drinks inappropriately already and I think it would be neglectful of the public's health to assume that they are able to take in the so called evidence, apply it to their situation without giving them appropriate definitions to begin with. The reason that these terms have not been defined is that it is too hard to do so - but this doesn't mean that you can just leave it open to interpretation - the public is looking to you for interpretation and you need to be specific. What should be made clear is that in almost ALL cases, sports drinks are NOT appropriate for children, and probably most adults. If anything, we should be looking more at warning labels.

**2. The disregard for the nutrient profile scoring criterion (NPSC).**

It appears very strange to me that the FSANZ would disregard one of its own regulatory tools to make exception for FSSF and ED because they are "specifically formulated for specific dietary purposes." To be frank, if this were to go through, it would cement in my mind the complete lack of integrity that the FSANZ has. Why have something like the NPSC if you aren't going to use it?

### **3. The yuck factor**

My last argument is not based on any legal or scientific fact, but is simply an observation as a lay person as well as a medical professional. Too often I see people genuinely trying to be healthy but have been completely misled and let down by the food and health industry. If you think that a lay person is well enough equipped to decipher the labels at the supermarket shelf then you are mistaken. I know this, because as much as we would like to think that evidence based medicine is the final word, it must always be taken with a pinch of salt - every study ever conducted has flaws and cannot be applied to every single individual's situation. If I, as an educated person working within the field (and yourselves) take x amount of time sifting through the evidence, what hope does a busy mum with screaming kids at the checkout have?

I would suggest that one of the most devastating impacts upon our health is the mis-information (or mis-leading information) that has been pumped out through our groceries.

I was in the supermarket around Halloween and bought a packet of chuppa chup lollie pops and noticed their claim "NO FAT!" I do not dispute this fact, but I would ask of you to think very carefully about the information - can you see that this is mis-leading? can you see that many people (adults included) would see that as persuasion to buy the product as they are more likely to think the product is healthier? If you can't then I believe you are in the wrong job.

I am strongly in opposition to the new proposal and actually would suggest that all food labeling in Australia and New Zealand needs to be reviewed. What I would like to see is that any product just has its nutritional information on the back and its product name on the front (banning 'lite' or 'diet' etc.). Uncomplicate the entire matter for consumers, rather than protecting the so called rights of industry.

Thank you for your time,

Dr Rebecca Kathage