

BioActive

Technologies International

A New Image International Company

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ACKNOWLEDGED

Fax

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17.7.02

To: ANZFA

From: [REDACTED] Technical Manager

Fax: [REDACTED]

Pages:

Phone:

Date: 1st July 2002

Re: Submission for Proposal P235

CC:

Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐

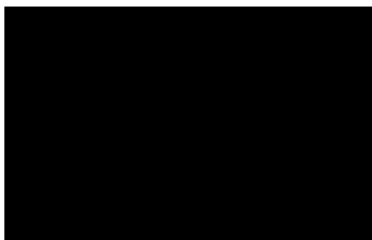
Dear Sir,

Please accept the enclosed submission for consideration.

Earlier attempts to send this by email to anzfa.nz@anzfa.gov.au appear to have been unsuccessful.


I can be contacted at the address above.

Kind regards,

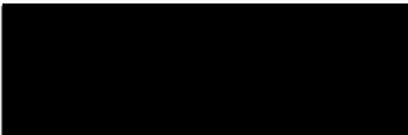


**Submission to ANZFA Proposal P235;
Review of Food-Type Dietary Supplements**

On behalf of the New Image International Group of Companies, incorporating
Symbiotics (NZ) Ltd and BioActive Technologies International Ltd.


Technical Manager
BioActive Technologies International Ltd.
New Image House,
19 Mahunga Drive
Mangere Bridge
Auckland
New Zealand

28th June 2002



New Image International has been selling food supplements including FTDS products, in New Zealand and Australia for in excess of 10 years. Sales are through both multi-level-marketing (Amway is an example of a MLM company) and retail outlets.

2.1.1 Current market for FTDS (Page 15)

- New Image sell a range of FTDS products, most of which are powdered drink products. Our top five FTDS products account for NZ\$920,000 pa, in sales in the New Zealand-Australia market, of which a third is from sales through retail outlets. Significant growth is expected in the next 12 months.
- Data on the size of our share of the FTDS market share is not known at present.
- We make our own products, the majority for export, using an approximately 50/50 mix of New Zealand sourced and imported ingredients.

2.4.1 Addition of Nutritive Substances

- We don't have any objection to the current ANZFA policy on the addition of vitamins and minerals to FTDS, but believe it could be expanded.

2.4.2 Special Purpose Foods

- We would like to see a mechanism where new special purpose food categories can be accommodated. For example we sell several weight loss, low energy drinks, which have been formulated to meet the needs of an established market segment. At present there is no category for these products.
- We would support FTDS becoming part of the special purpose foods category described in section 2.4.2.

Questions on Added Substances (Page 27)

- We believe figure 2, section 2.4.1, does address safety concerns around FTDS.
- Regarding Nutritive Substances, we expect there will be a future need to expand the category beyond vitamins and minerals to substances which can be shown to meet a public health need in both restoration and fortification roles; for example the use of colostrum in a FTDS.

2.4.7 Labelling and Claims

- We don't believe FTDS should be exempt from nutrition information requirements (standard 1.2.8, volume 2) and would like to see FTDS conform to these standards, or something very similar. The P135 definitions for claims are also of value to FTDS.

