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8/10/01

Goodman

Fielder

ACKNOWLEDGED



4 October 2001

Project Manager- Proposal P236
Australia New Zealand Food Authority
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Dear Sir/Madam,

Proposal P236 – Development of Joint Food Regulation for Sports Foods

Goodman Fielder is not directly involved in the marketing of sports foods, however we offer the following comments in the interests of achieving effective harmonised regulation of these products, and from the perspective of good general nutrition and regulatory policy.

Firstly, we agree that the principles developed to guide in the establishment of a joint regulation are appropriate, and provide a suitable nutrition policy framework for sports foods. We support the proposition that sports foods are different in their intended purpose from general foods, and therefore should be regulated differently, and subject to different compositional criteria.

The current New Zealand Food Regulation permissions for Special Purpose Foods appear too loose for effective regulation of this class of foods. Similarly the New Zealand Dietary Supplement Regulations allow the production and marketing of products that do not appear to meet fully the original intent of the regulations in that many products do not meet the form of presentation that was originally envisaged for dietary supplements, ie. the controlled dosage interpretation seems to have been widely stretched. As identified by the Authority, this has led to market inequities, especially for Australian manufacturers.

Goodman Fielder therefore would support Option 2 – Full revised regulatory provisions within Volume 2 of the joint Australia New Zealand Food Standards Code; the New Zealand Ministry of Health proceeding with the proposal to exclude foods from the scope of the New Zealand Dietary Supplements Regulations; and the subsequent repeal of the relevant provisions of Volume 1 and the New Zealand Food Regulations.

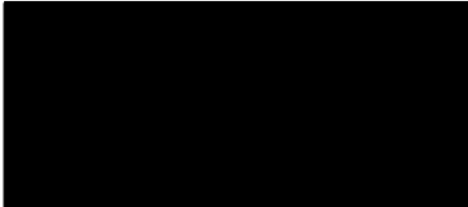
We support full regulation over the co-regulatory option because it provides greater enforceability, and it requires imported products to meet the same conditions. Option 2 would provide greater consistency in regulatory provisions for products sold as foods, as



well as appropriate control over composition and labelling to minimise consumer confusion and potentially misleading information.

We look forward to hearing more about the progress of this proposal and to the opportunity of possibly providing additional input.

Yours sincerely,



Scientific Affairs Manager