

**From:** Mike Barnfield <Mike.Barnfield@ch2.net.au>  
**Sent:** Friday, 16 December 2011 4:16 PM  
**To:** [REDACTED]  
[REDACTED] comments re P242 - Foods for special medical purposes

[REDACTED]

Please see below for written submission on P242 - Foods for special Medical purposes.

Of particular interest to Clifford Hallam Healthcare (CH2) is;

**Division 2 – Sale of food for special medical purposes**  
**Restriction on the sale of FSMPs:**

*4. Please comment on the feasibility and appropriateness of this approach in practice.*

CH2 strongly disagrees with the proposed requirement of a written request as described in Clause 4 c) in order for a consumer to purchase FSMP products. Comments made during the phone conference were in reference to CH2's experience with the home Enteral Nutrition (HEN) program which requires written "registration" in order to access product. In considerations to the proposed changes our objections are;

- While this works well for the HEN program it would not lend itself to the administration of ad hoc consumers.
- The policing of written permission from consumers will be extremely difficult as there is no database of who can give permission for a wholesaler to reference from (as with supply of schedule drugs).
- How will this new requirement be communicated to consumers, and the wider health profession to ensure complete understanding of the requirements for purchase of FSMPs.
- This will make the process of buying from a Wholesaler complex and onerous, effectively limiting a legitimate supply option in the market place for consumers.

CH2 does not fully understand the concern regarding risk management of FSMP products in Australia, when put in context of other markets around the world where there are no restrictions. CH2 believes that while this will reduce the ability for wholesalers to supply and reduce competition in the market place, there will be little or no positive effect in the context of risk management for FSMPs.

Regards,

**Mike Barnfield**  
**National Quality, Health & Safety Manager**



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