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**Subject:**

FW: general comments re P242 - Foods for special medical purposes  
[SEC=UNCLASSIFIED]

The Dietitians Association of Australia (DAA) appreciates the opportunity to consider Proposal P242 – Food for Special Medical Purposes with respect to some outstanding issues raised in submissions to the December 2010 Consultation. DAA is generally in agreement with the approaches proposed by FSANZ in

1. Definitions and interpretations in draft Standard 2.9.5
2. Restriction on sale of FSMPs
3. Transition period
4. Labelling requirements
5. Compositional issues
6. Exclusion of very low energy diet products
7. Composition
8. Standards that do not apply to FSMP
9. Change of wording: sole source of nutrition to replace nutritionally complete
10. Labelling requirements update.

With respect to questions 12 and 13, the information needed to determine the nutritional adequacy of a product when used as a sole source of nutrition includes knowledge of the composition of the product against disease specific requirements where known, or at least against cautious application of a specific Nutrient Reference Value. Monitoring nutritional adequacy may be done by anthropometric measures.