

Nutrition Australia Qld 'Additional Comments'

RE : P242 – Food for special medical purposes

Nutrition Australia Qld is a distributor of Foods for Special Medical Purposes. Our staff include several accredited practising dietitians who are available to consumers and health professionals to provide advice on how to use FSMPs, but we strongly feel there is a need for written requests for FSMPs from appropriately qualified health professionals to ensure their safe use.

1.0 Definition of Food for special medical purposes

We would like clarity as to whether the definition includes fibre supplements and thickening agents for texture modification. Nutrition Australia Qld would support these being included in the definition as both categories of product are used as part of treatment for particular health issues.

2.0 Restriction on the sale of FSMPs

2.1 Categories for valid requests for FSMPs

NAQ supports in principle the need for restriction on the sale of FSMPs but is concerned that the 3 current categories listed may exclude written requests from some health professional who are well qualified to give this advice.

We recommend the following amendments to categories (a) and (b) (see highlighted areas):

- (a) A pharmacy, hospital, hospice, aged care facility or disability facility; or
- (b) A medical practitioner or accredited practising dietitian or domiciliary nurse or practice nurse or speech pathologist (for thickener products only); or
- (c) A person who holds a written request from a business or person mentioned in paragraph (a) or (b) for the food to be supplied to the consumer or
- (d) When a person has no written request a significant attempt is made to seek a written request and this is documented

2.2 Concerns about evidence for requests with on line sales

We are also concerned about on-line purchasing of supplements where there is no requirement for any evidence of a request made by a health professional under categories (a) and (b).

An example of this situation is provided in Attachment A .

We recommend that:

- (a) any on-line sale of FSMPs requires the name and a provider or registration number for a health practitioner from category (b) or that a written request is forwarded by email or fax.

- (b) there is regular auditing of on-line ordering systems to ensure these requirements are being met.

3.0 Labelling Requirements

Nutrition Australia Qld supports the inclusion of a lot no. and expiry date on inner packages. We believe this is especially essential to minimise risk for consumers using FSMPs at home. When a complaint is made about a product, easy access to the lot number and expiry date expedites the process of tracking down any offending products which may need to be recalled.

For any further clarification or information about these comments please contact either:

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Or

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ATTACHMENT A

On-line ordering – no official request required



Welcome, guest
Login : Create an account

CincottaChemist

Famous for value, famous for care.



Your cart has 1 item
View cart : Checkout

Checkout & Payment

First-time buyer

Returning customer



Your Details

First name

Last name

Email address

Contact phone #



Shipping Address

Company/Attn

Street address

Address (more)

City/suburb

State Select

Postcode

Country Australia (change)



Billing Address

☒ Same as shipping

Street address

City/suburb

State Select

Postcode

Country Australia



Payment Details

Pay by cheque/money order

Amount due: \$9.90

Cardholder name

Card number

CCV number

Last 3 or 4 digits on card back

Expiry 01 January 2011

[Place order](#)



Payment processing powered by eWAY



Order comment

Delivery:

☐ If no one is home, please leave parcel at my address

Optional delivery instructions or comments