

Project Officer Proposal P1064
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

27 March 2025

Tēnā koe,

P1064 – Australian only Infant Formula Product Standard

New Zealand Food Safety (NZFS) appreciates the opportunity to comment on the Call for Submissions for Proposal P1064 – Australian only Infant Formula Product Standard. This submission does not represent a New Zealand Government position, which will be a matter for the New Zealand Government should notification be made by the FSANZ Board to the Food Ministers' Meeting.

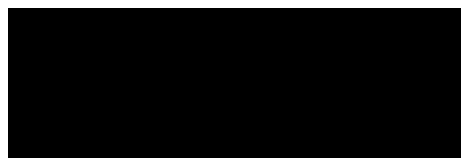
We note that section 2.5.1.3 of the P1064 document outlines Food Standards Australia New Zealand's understanding of the provisions that remain in force for the regulation of infant formula products in New Zealand. We confirm that the first bullet accurately reflects the current situation for New Zealand. However, we have some concerns regarding the portrayal of Standard 2.9.1 in New Zealand in the second bullet point and request that FSANZ remove this statement. Bullet point two is reproduced below:

Standard 2.9.1 as it is in force in New Zealand is not part of the Code for the purposes of the FSANZ Act. Nor is it covered by the 'Australian New Zealand Food Standards System' established by the Treaty.

In addition, we note the draft variation to standards 1.1.1 and 2.9.1 of the Food Standards Code provided at Attachment A. We agree these amendments achieve the intent that Standard 2.9.1 of the Code does not apply in New Zealand.

We also plan to provide information on the MPI website to ensure clarity of the current regulatory requirements for the composition and labelling of infant formula products that apply in New Zealand.

Nāku noa, nā



**Director Food Science and Risk Assessment
New Zealand Food Safety**