

3 - 11 Hunter Street,
PO Box 1925, Wellington.
Tel. +64 4 470 9223
Fax. +64 4 496 6550
Email. admin@fgc.org.nz
www.fgc.org.nz



NEW ZEALAND FOOD & GROCERY COUNCIL

7 May 2012

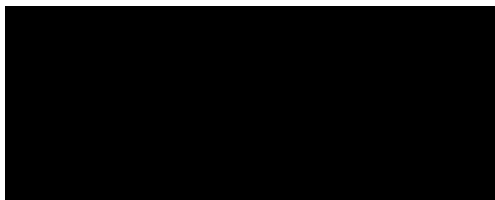
Manager
Application Assessments
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
New Zealand

Email: submissions@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Assessment Report for **Application A1065** *Packaging Size for Phytosterol-enriched milk*.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
**Application A1065 – PACKAGING SIZE FOR PHYTOSTEROL-
ENRICHED MILK – Assessment Report**
7 May 2012

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on Application A1065 – Packaging Size for Phytosterol-enriched Milk – Assessment Report.

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. A number of these manufacturers and suppliers are major importers and exporters in New Zealand. NZFGC member companies supply over 95 percent of the processed food and beverages to the New Zealand grocery retail industry and over 70 percent of supermarket packaged good sales.

The NZFGC understands that FSANZ reviewed, amongst other things, the rationale for the volume restriction and the current scientific evidence on the safety of phytosterols and concluded that there are not believed to be any public health or safety concerns relating to removing the volume restriction.

Comments

The NZFGC supports the conclusion reached by FSANZ that would see the Australia New Zealand Food Standards Code amended to remove the volume restriction for phytosterol-enriched milk.

NZFGC appreciates that when phytosterols were proposed for addition to foods in 2004 there was a general concern across Australian jurisdictions and New Zealand about safety. We note that at that time, post-market monitoring in Europe (where a broader range of phytosterol-enriched foods had been available for some time) showed that consumers welcomed choice of products, and over-consumption did not occur. We note also that the mandatory advisory label statements which advise that the product should be consumed as part of a healthy diet and may not be suitable for children under the age of five years and for pregnant or lactating women is remaining in place.

It is also important to note that consumers who are using these products seem to be well aware that ‘more is not better’ and that plant sterols do not provide additional benefit when consumed in excess of 3 g per day.

The FSANZ assessment concerning the prospect of removing the volume restriction noted that there was “no new toxicological, clinical or epidemiological evidence indicating the need

to change the previous safety assessments". Again, reference to European and USA information on the use of phytosterol-enriched foods has been made and does not suggest areas of concern had been identified.

The NZFGC does not agree with the FSANZ belief that removing the volume restriction from phytosterol-enriched milk may possibly increase the consumption of such milk by non-target populations (mainly children). The NZFGC view is based on the cost of phytosterol-enriched products. Such products are generally significantly more expensive to purchase than other milks and in the current 2012 economic environment, separation of products within a household for the target person is more than ever likely to be a reality than it was in 2006. In any event, we note that there is no evidence to suggest any increased consumption by children will have an adverse health effect.

Any increased consumption occurring in the target population is supported on the basis that this is likely to deliver additional benefit.

Questions asked

Q1. Are you aware of any additional information on the safety of phytosterol-enriched foods?

A1. No.

Q2. Do you have any additional information on the consumption of phytosterol-enriched milk by target and non-target consumers?

A2. No. However, cost impacts on utility are suggested as providing a deterrent to the sharing of such products within a household.

Q3. Do you have any information of potential costs and benefits of the proposed change i.e. removal of the volume restriction.

A3. No. However, consumption by those in the target group who may have struggled to consume the recommended amount of 3g per day may find milk as a more convenient way of consuming phytosterols without the problems presented by small volume packaging.

Conclusion

The NZFGC supports choice in the market place and for manufacturers. On this basis and in the absence of safety concerns, the NZFGC supports the amendment to the Australia New Zealand Food Standards Code that would remove the volume restriction on phytosterol-enriched milk.

For further information, please contact:

██████████
New Zealand Food & Grocery Council
Email: ██████████