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The Registrar  
Food Standards Australia and New Zealand  
[submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

To whom it may concern

**Reference “A1173 Minimum Protein in Follow on Formula”**

**Food Standards Australia New Zealand (FSANZ) received an application from Nestlé Australia Limited and Nestlé New Zealand Limited in January 2019. The application seeks to reduce the minimum protein requirement for follow-on formula from 0.45 g/100 kJ to 0.38 g/100 kJ in the Australia New Zealand Food Standards Code (the Code). The request relates to all follow-on formula products regulated by Standard 2.9.1 – Infant Formula Products.**

Dietitians are registered health professionals who meet standards required by the New Zealand Dietitians Board under the Health Practitioners Competency Assurance Act (HPCA) 2003. In New Zealand, by law, dietitians must be registered with the Dietitians Board and hold a current practising certificate, work within a specified scope of practice, participate in a continuing competency programme, and adhere to a Code of Ethics.

Dietitians New Zealand Incorporated (Dietitians NZ) is the professional association of registered dietitians and associated nutritional professionals. With a current membership of approximately 550, we represent the largest group of fully trained food and nutrition professionals in New Zealand. Dietitians NZ exists to build a strong and sustainable profession that empowers New Zealanders around food and nutrition; and inspire change to enhance the health and wellbeing of Aotearoa, New Zealand. We trust the comments made in our submission will be given due consideration.

Dietitians NZ Paediatric Special Interest Group (Paeds SIG) members were consulted on the application A1173 to reduce the minimum protein requirement for follow-on formula from 0.45 g/100 kJ to 0.38 g/100 kJ in the Australia New Zealand Food Standards Code (follow-on formula products regulated by Standard 2.9.1 – Infant Formula Products).

The Paeds SIG are supportive of application A1173 based on the evidence provided with the Call for Comment by FSANZ.

Rationale for Dietitians NZ supporting application A1173 include

- The FSANZ Code would then align with European (EU) regulations

Thank you for the opportunity to make a submission.

Yours faithfully

Contributors to this submission are the Dietitians NZ Paediatric Special Interest Group (SIG)

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**Dietitians NZ Paediatric SIG Convener**

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