

9 July 2021

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**By email:** [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Submissions on FSANZ Consultation – Proposal P1030: Composition and labelling of electrolyte drinks**

I am writing on behalf of Frucor Suntory New Zealand Limited (Frucor Suntory) to provide comments in response to Food Standards Australia New Zealand's (FSANZ) Proposal P1030: Composition and Labelling of Electrolyte Drinks Consultation Paper, released on 28 May 2021.

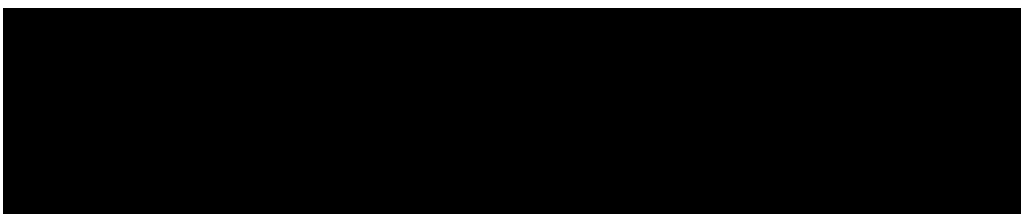
Frucor Suntory is a leading Australasian beverage company. Since 2009, Frucor Suntory has been a part of the Suntory Group, which employs nearly 40,000 people globally. Frucor Suntory is responsible for manufacturing and marketing a range of beverage products, including Gatorade, Mizone and Maximus, and is well-known for its position at the forefront of the Australasian beverage industry. Frucor Suntory regularly develops new products and implements effective sales and marketing strategies, with a commitment to providing healthier options.

Frucor Suntory is also an active member of various relevant bodies, including the New Zealand Beverage Council, the Australian Beverages Council, New Zealand Food and Grocery Council and the New Zealand Nutrition Foundation and provide executive and technical expertise on several working groups within these organisations.

General comments

Frucor Suntory supports FSANZ's assessment in Proposal P1030 to:

- amend the compositional and labelling requirements for electrolyte drinks to reflect current science and innovation within the category; and
- review nutrition content and health claims permitted for electrolyte drinks on labels and advertising to reflect current science.



However, we do not support FSANZ's proposals that place further restrictions on claims for the electrolyte drink category and require overly prescriptive labelling provisions, which are unlike any other category within the Food Standards Code.

#### Specific comments

Frucor Suntory has reviewed the proposed amendments to Std 2.6.2 and discussed the impact of each issue in consultation with the wider non-alcoholic beverages industry through the Australian Beverages Council (ABCL). The views of the non-alcoholic beverages industry are appropriately and accurately expressed in the ABCL's submission to the P1030 consultation paper. Frucor Suntory confirms its strong support for the positions detailed in the ABCL's submission and supports any additional information provided to FSANZ to justify these positions.

Thank you for taking the time to consider Frucor Suntory's position on Proposal P1030 and this supporting letter of the ABCL's submission. If you wish to discuss any aspects of this letter, please contact me.

Yours sincerely,

