



Abbott Nutrition International
Australia & New Zealand

RESPONSE TO -

PROPOSAL 1023 -

Tutin, Tocopherol & Food for Special Medical Purposes

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Abbott Nutrition wishes to thank Food Standards Australia New Zealand (FSANZ) for the opportunity to provide feedback on Proposal 1023 - Tutin, Tocopherol & Food for Special Medical Purposes.

Please find below Abbott Nutrition's response addressing FSANZ specific question for Standard 2.9.5 – Food for Special medical Purposes.

Apart from the listed transitional arrangements, are there other elements of Standard 2.9.5 that would require time to transition if the Standard's commencement date were brought forward?

Abbott Nutrition has completed an extensive review of its current product range available in the Australian and New Zealand market. Should an early commencement date for Std 2.9.5 be approved, Abbott Nutrition would request additional exemptions be listed within the transitional arrangements.

To ensure full compliance with Std 2.9.5 by the original commencement date of 28 June 2014 and prevent any disruption of supply to market, Abbott Nutrition requests the below three clauses from Std 2.9.5 be listed in addition to the eight provisions made by FSANZ in P1023 -

- **Clause 4** Claims must not be therapeutic in nature
A claim in relation to a food for special medical purposes must not –
 - (a) refer to the prevention, diagnosis, cure or alleviation of a disease, disorder or condition; or
 - (b) compare the food with a good that is –
 - (i) represented in any way to be for therapeutic use; or
 - (ii) likely to be taken to be for therapeutic use, whether because of the way in which the good is presented or for any other reason.
- **Clause 7 (1) (a)** - if a food for special medical purposes is represented as being suitable for use as a sole source of nutrition, the food must contain – not less than the **minimum** amount, as prescribed in Column 2 of Schedule 2, of each vitamin, mineral and electrolyte contained in Column 1 of that Schedule
- **Clause 10(3)(e)(i)** - a statement to the effect that excess consumption of the food may have a laxative effect if the food contains -
 - one or more of the substances listed in Table 1 to this paragraph, either singularly or in combination, at a level of or in excess of **10 g/100 g**