



24 March 2016

Food Standards Australia New Zealand
Boeing House
55 Blackall Street
BARTON ACT 2600

Attention: Standards Management Officer

**Proposal P1024 – Revision of the Regulation of Nutritive
Substances and Novel Foods**

The Food & Beverage Importers Association (“FBIA”) is an industry association that represents importers into Australia of food and beverages, both retail ready and ingredients for further processing.

The FBIA supports Option 3, the graduated risk approach, based on the level of risk inherent in various types of novel food, to the regulation of nutritive substances and novel foods.

As shown by FSANZ, the current Code provisions relating to nutritive substances and novel foods, particularly the definitions associated with them, create uncertainty, for both industry and regulators, as to whether particular foods require permission in the Code before they can be sold, and therefore whether the foods should be subject to pre-market assessment by FSANZ.

Maintenance of the status quo (Option 1) is not a solution to the very clear problem posed by the current Code. Minor amendments of the current standard, primarily the definitional elements associated with nutritive substances and novel foods (Option 2), may suffice for current considerations of foods, but would constrain innovation within the terms of the new definitions and so, would not be an adequate solution to the problem.

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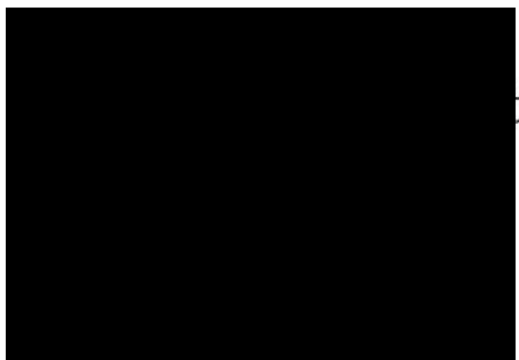


The third option, the more innovative, graduated risk approach, is much to be preferred.

In terms of more specific comments on the document, the FBIA supports the submission by the Australian Food & Grocery Council.

Should you have any questions on the above, please do not hesitate to contact me.

Yours faithfully,



Secretary