

The WRIGLEY Company Pty. Limited CHEWING GUM MANUFACTURERS

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Project Manager P235
Food Standards Australia New Zealand
PO Box 7186
Canberra Mail Centre, ACT 210

Dear Sir or Madam,

The Wrigley Company would like to support the proposed Standard for Dietary Supplements for Australia and New Zealand. The current situation, which allows Dietary Supplements to come into Australia from New Zealand, but does not allow Australian manufacturers to compete with these products is totally inequitable and must be rectified.

Internationally, The Wrigley Company has products that have clinically proven benefits to teeth. We would like to produce these products in our Sydney factory, which is the distribution centre for the Asia Pacific Region. However, in order to be able to make suitable claims about the products and sell them in the Australian market, it would be necessary to produce in Australia and export to New Zealand and then re-import into Australia as a New Zealand Dietary Supplements. Not only is this scenario ludicrous, it is also a very expensive exercise. Due to the inability to produce in Australia and then sell directly to Australian consumers, these products are not financially viable. The cost of shipping across the Tasman twice would add so much to the price of the product, the required retail price would be higher than most consumers would be willing to pay. It would also be a low value product to the consumer as most of the cost would be contributed by unnecessary shipping costs.

A number of questions have been asked by ANFA/FSANZ about the nature of a proposed standard for dietary supplements for Australia and New Zealand. There is an existing model in the existing New Zealand Dietary Supplements Regulations. These regulations permit a diverse range of products and they are very simple. There is no evidence safety or other problems caused by the dietary supplements sold in New Zealand.

As per the New Zealand Dietary Supplements Regulations, vitamins and minerals listed in the Schedule to Standard 1.1.1 should be permitted in dietary supplements. The use and claims about vitamin and mineral content should be not be limited unless there are safety issues. If there is a safety reason to restrict the use of vitamins and minerals, such restrictions should only be set based on the maximum safe intakes and not on current RDI as appears to be the case with foods.

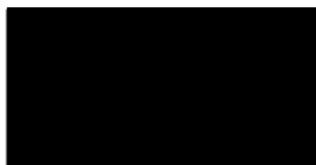
Dietary supplements may also contain functional herbal materials. The safety of these is already assessed by the TGA. It would be unnecessary for FSANZ to duplicate the safety aspects of substances already assessed by the TGA. Herbal substances listed Australian Register of Therapeutic Goods (ARTG) should be permitted in dietary supplements.

One major purpose of dietary supplements is functionality. These products have been called functional foods and nutraceuticals. Dietary supplements supplement the normal diet to help address imbalances and deficiencies and they usually provide a functionality that foods in the normal diet do not. There is no benefit to consumers unless it is possible to make health and other claims. These would need to be adequately substantiated by peer-reviewed published data or by clinical trials about dietary supplements. There should be guidelines or regulations relating to the amount of proof required to make a claim, but there should be no need for pre-clearance of dietary supplements or claims about them. General trading laws about false and misleading claims should be adequate to protect the public.

In many ways, dietary supplements will look and function like foods. They will need food additives and processing aids in their manufacture. The existing New Zealand Dietary Supplements Regulations permit the use of most food additives without restriction. This should be retained.

Thank you for the opportunity to comment and we forward to be able comment on more fully developed concept and standard in the near future.

Yours sincerely



DIRECTOR - SUPPLY CHAIN