



AUSTRALIAN FRUIT JUICE ASSOCIATION

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ABN 57 186 077 676

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Standards Branch

Food Standards Australia New Zealand

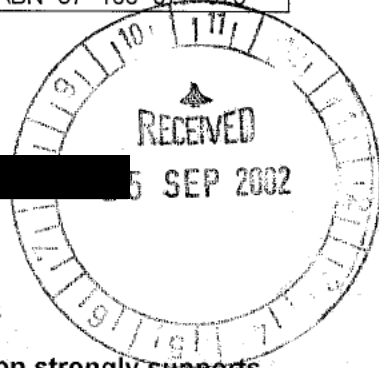
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ACKNOWLEDGED

PROPOSAL P235

REVIEW OF FOOD-TYPE DIETARY SUPPLEMENTS



The Australian Fruit Juice Association and New Zealand Juice Association strongly supports the introduction of a Food-Type Dietary Supplement Standard into Australia, provided the New Zealand Dietary Supplement Regulations are repealed to correct the existing inconsistencies in line with FSANZ harmonised approach.

We believe FTDS foods do not fit into existing FSANZ Standards covering Novel Foods, or Special Purpose Foods, and so a new specific Standard is needed. The approach we support is "2(a): Horizontal Approach", applied consistently to all foods, to keep the Standard simple and to give consumers the greatest choice. In particular, any amendment to the current regulations covering what may be added to beverages should also apply to fruit juices. Consumers rightly perceive fruit juices to be healthy, and so it is inconsistent to permit the addition of ingredients for health purposes to other beverages, as in Standard 2.6.4 Formulated Caffeinated Beverages, but not to fruit juices.

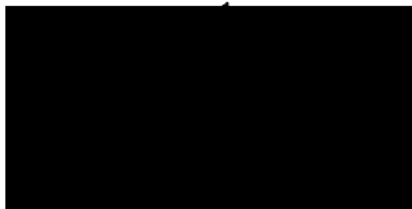
To give consumers information to make informed choices, the new FTDS Standard needs to clearly state:

1. What can be added.
2. Maximum and minimum levels, if necessary.
3. How FTDS's need to be labelled, perhaps including advisory statements for some ingredients.
4. What claims, including health claims, can be made.

This should address FSANZ concerns about the safety of FTDS; the delivery of potentially harmful ingredients such as vitamins and botanicals in foods at regulated levels is self-limiting, and so safer than direct consumption of such ingredients for example, from health stores.

We look forward to participating in the development of an FTDS Standard.

Yours sincerely,
on behalf of AFJA/NZJA



SECRETARY
AFJA

DIETARY SUPPLEMENTS

24/9/2002

The Australian Fruit Juice Association and New Zealand Juice Association strongly supports the introduction of a Food Type Dietary Supplement standard into Australia, provided the New Zealand Dietary Supplement Regulations are repealed, to correct the existing inconsistencies, in line with FSANZ harmonised approach.

We believe FTDS foods do not fit into existing FSANZ standards covering Novel Foods, or Special Purpose foods, and so a new specific standard is needed. We also favour a simple approach, applied consistently to all foods, to give consumers the greatest choice. Therefore, the approach we support is "2b.ii Vertical Approach", a new code covering supplementary foods etc, clearly spelling out what may be added to orange juice and other foods.

In particular, any amendment to the current regulations covering what may be added to beverages should also apply to fruit juices. Consumers rightly perceive fruit juices to be healthy, and so it is inconsistent to permit the addition of ingredients for health purposes to other beverages, as in Standard 2.6.4 Formulated Caffeinated Beverages, but not to fruit juices.

To give consumers information to make informed choices, the new FTDS standard needs to clearly state:

1. what can be added
2. maximum and minimum levels, if necessary
3. how FTDSs need to be labelled, perhaps including advisory statements for some ingredients
4. what claims, including health claims, can be made

This should address FSANZ concerns about the safety of FTDS; the delivery of potentially harmful ingredients, such as vitamins and botanicals, in foods at regulated levels, is self limiting, and so safer than direct consumption of such ingredients for example, from health stores.

We look forward to participating in the development of a FTDS standard.

Amendment to submission: P235