



Food Liaison Pty Limited [REDACTED]



23 August 2002

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

Dear Sir or Madam

I would like to comment on the proposal to develop a Standard for Dietary Supplements for Australia and New Zealand. Generally, as a Member of the Australian Food and Grocery Council, Food Liaison supports the submission made by the AFGC. I have some additional points to make. I apologise these comments are submitted after the due date.

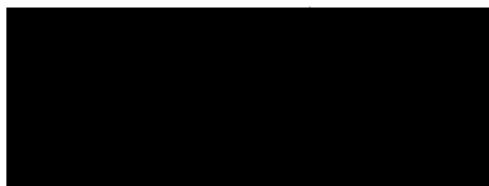
Currently, dietary supplements may come into Australia from New Zealand, but Australian manufacturers are not able to compete with them in the Australian market without exporting products to New Zealand, then re-importing the same product into Australia. It also means that Dietary Supplements imported into Australia from other countries must come into Australia via New Zealand. These requirements add significant costs to products and they are naturally passed on to consumers.

It is evident there is no real safety problems with Dietary Supplements as, if there were, the mutual recognition treaty with New Zealand would have excluded them in the same way that therapeutic goods were excluded.

We consider that the New Zealand Dietary Supplements Regulations 1984 provide the basis for an Australia New Zealand standard. These regulations permit a diverse range of products and they are very simple. However, these regulations are well out of date with respect to the food additives permitted. In particular the range of intense sweeteners permitted in Dietary Supplements under the New Zealand Regulations is limited to aspartame, saccharin and cyclamate. There are a number of other sweeteners now available and legal in food in Australia and New Zealand.

I would highly recommend that an interim Standard for Dietary Supplements should be introduced into the Food Standards Code with permission to use the food additives currently permitted in sports foods, but with all other requirements the same. Sports foods represent the closest category of foods to dietary supplements. This move would create equity between Australia and New Zealand, and to bring the current Dietary Supplements Regulations up to date with respect to food additives. This would also eliminate the current inequity between Australia and New Zealand and allow adequate time to develop a new standard.

Yours sincerely



Managing Director