From: [redacted]
Sent: Wednesday, 7 August 2002 17:54
To: slo
Subject: ANZFA: Applications and Submissions - Submission

ANZFA - Australia New Zealand Food Authority

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Wednesday, 7 August, 2002

1. Assessment Report Number: P235
2. Assessment Report Title: Review of food-type dietary supplements
3. Organisation Name: CSIRO Health Sciences & Nutrition
4. Organisation Type: Government Agency
5. Representing: CSIRO Helath Sciences & Nutrition
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12. Submission Text: CSIRO Health Sciences and Nutrition are pleased to accept the invitation to respond to the review of food-type dietary supplements (FTDS). Regulation of these supplements is an important issue for the consumer, industry and public health and we are of the opinion that foods should be treated as uniformly as possible. Thus, we submit that FTDS should be considered under the legislation covering novel foods. This would be equitable for manufacturers and give assurance to consumers Specifically, we support Option 2a : "A "horizontal" approach that is based on the premise that the policy bases of particular standards (such as Standard 1.3.2 and/or Standard 1.4.4) are reviewed and amended/expanded. This approach would have the effect of allowing for the manufacture of many of the FTDS not currently addressed by Volume 2, and opening up the food supply generally to more liberal permissions." This option would guarantee ease of standardisation, equity and harmonisation. Although this might incur some costs for some manufacturers it would bring the whole industry in line with the cost structure borne by the majority of the industry. This would also provide substantiation of benefit for the consumer and minimisation of risk to industry and public health.. It would be consistent with the approach to risk-based assessment (Figure 2) which adequately addresses safety concerns around FTDS and it is important to consider history of use and history of purpose when making the assessment. We could see no gaps in Figure 2 which would allow categories of "added substances" in FTDS that would not be captured by the framework. Particular micronutrients that are not permitted, or are restricted, under standard 1.3.2 – Vitamins and Minerals do not require further consideration in relation to FTDS since they should be covered under Novel Food regulations. The definition of nutritive purpose should be extended to include functional purpose where there is a measurable physiological result. Single and mixed foods should be considered on a case-by-case basis and should be covered under novel food regulations. We disagree with Figure 1 "Continuum of Foods to Therapeutic Products" and make the point that this continuum does not always apply. It is possible in some cases that something classed as a general food could also be classed as a therapeutic agent. An example is the case of wheat bran, a food that can be just as effective as a laxative as therapeutic agents sold on prescription or as OTC preparations.