



26 May 2016

Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
New Zealand  
[submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Submission Consultation Paper – Proposal P1028 Infant formula**

Thank you for the opportunity to contribute to the FSANZ Proposal P108 to revise and clarify standards relating to infant formula in the *Australia New Zealand Food Standards Code* (the Code)

Dietitians are registered health professionals who meet standards required by the NZ Dietitians Board under the Health Practitioners Competency Assurance Act (HPCA) 2003. In New Zealand, by law, dietitians must be registered with the Dietitians Board and hold a current practising certificate, work within a specified scope of practice, participate in a continuing competency programme and adhere to a Code of Ethics.

Dietitians New Zealand Incorporated (Dietitians NZ) is the professional association of registered dietitians and associated nutritional professionals. With a membership of approximately 600, we represent the largest group of fully trained food and nutrition professionals in New Zealand. This submission has been developed by National Office in consultation with members who have appropriate knowledge and skills in this area and reflects the comments and opinions of our overall membership.

Dietitians NZ support the Ministry of Health statement *Breastfeeding is the biological norm for infant feeding and is a traditional practice in most cultures. It is the unequalled way of providing ideal food for the healthy growth and development of infants and toddlers. Breast milk is safe and clean and contains many functional components, including live cells and antibodies, which help to protect the infant against many common childhood illnesses.* (Reference: New Zealand Ministry of Health Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2): A background paper - Partially revised December 2012)

Dietitians NZ support that for those infants who are not breast fed, the alternative is an infant formula which is safe and suitable for consumption by an infant under the age of 12 months

**Dietitians NZ have made comments on Q3.12, Q3.14, Q3.19 and Q3.20**

### Supporting Document 3: Provision of Information

**Q3.12** In addition to the current requirement to declare nutrition information per 100 mL as consumed, should it be mandatory or voluntary to declare per 100 g of powder (or per 100 mL for liquid formula) as sold?

**Response:** voluntary

**Q3.14** Should the voluntary use of the base unit of per 100kJ be permitted?

**Response:** yes

**Q3.19** How can changes in the composition in an infant formula product be communicated to caregivers and health professionals

**Response:** It is the consumers right to be informed of changes to a product, however Dietitians NZ is unsure how this can be appropriately communicated given the current restrictions.

**Q3.20** What information about the change in composition would caregivers and health professionals find useful?

**Response:** Dietitians NZ support that any change in composition of an infant formula and the rationale for the change should be made available to caregivers and health professionals

Many questions to submitters are outside the scope of practice of dietitians however we look forward to the opportunity to provide feedback when the next document is published late 2016

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Paediatric Special Interest Group Convenor  
Dietitians NZ

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