



SUBMISSION

Submission to Food Standards Australia New Zealand (FSANZ)

Application A1074 – Minimum L-histidine in Infant Formula Products

December 2012

H.J. Heinz Company Australia Limited
2 Southbank Boulevard
SOUTHBANK 3006
VICTORIA AUSTRALIA

Heinz Wattie's Limited
513 King Street North
HASTINGS 4122
NEW ZEALAND

INTRODUCTION

H.J. Heinz Company Australia Limited (“**Heinz Australia**”) and Heinz Wattie’s Limited in New Zealand (“**Heinz Wattie’s**”) are part of the H.J. Heinz global group of companies. Heinz Australia and Heinz Wattie’s in this submission shall be collectively referred to as “**Heinz**”.

Heinz is one of the world’s leading producers of nutritious, convenient foods for every eating occasion and has been feeding families for more than 100 years. Heinz operates across the retail grocery and out of home channels, including hospitality and healthcare.

With combined experience of over 140 years, Heinz provides a positive presence in the Australasian grocery products industry.

Heinz offers a diverse portfolio of brands, including:

Heinz®	Wattie’s®	Golden Circle®	La Bonne Cuisine®
GC Raw®	Lea & Perrins®	Greenseas®	PMU®
Epicure®	Farex®	Nurture®	Hamper®
Imperial®	Ox & Palm®	Petdeli®	Cham®
Chef®	Pacific®	Crown®	LOL®
Craig’s®	Oak®	Original Juice Co®.	Popper®
Ice Magic®	Mediterranean®	Little Ripper®	Gourmet®
Breton®	Master Chef®	Wild Boy®	
The Good Taste Company®			
Cottee’s® (toppings, jelly and jams only)			

Heinz also manufactures and/or distributes products under licence, including:

Weight Watchers®	Complan®
Eta®	Rose’s® (jams only)
Tom Piper®	HP®

The Heinz product range includes:

infant food	infant cereal	baked beans	canned pasta
soup	Infant formula	ketchup & sauces	canned fruit & vegetables
fruit juice	cordial	bottled water	corned beef
jams, jelly & toppings	frozen meals	canned tuna	frozen vegetables

Heinz Australia and Heinz Wattie’s are members of the Australian Food & Grocery Council and the New Zealand Food & Grocery Council respectively.

Infant Feeding

Heinz fully supports and believes that breast milk provides the ideal nutrition for babies and breast feeding provides numerous benefits to both mothers and babies. However, if an infant is not given breast milk, an infant formula product is the only acceptable safe alternative for the first 12 months of an infant's life.

The Heinz portfolio of products includes Nurture® infant formula products. Heinz is a member of the Infant Nutrition Council (INC) that represents the infant formula industry in Australia and New Zealand. Heinz supports the aim of the *WHO International Code of Marketing of Breast-milk Substitutes (WHO Code)* and the local applications. Heinz is a signatory to the *Marketing in Australia of Infant Formulas: Manufacturers and Importers Agreement (MAIF Agreement)*, and as a member of INC have adopted *The Infant Nutrition Council Code of Practice for the Marketing of Infant Formula in New Zealand (INC Code of Practice)*. These agreements prescribe how information about infant formula can be marketed in Australia and New Zealand.

The aim of the WHO code and local agreements is *'to contribute to the provision of safe and adequate nutrition for infants, by the protection and promotion of breastfeeding and by ensuring the proper use of breast milk substitutes, when these are necessary, on the basis of adequate information and through appropriate marketing and distribution'*.

SUBMISSION

Heinz welcomes the opportunity to make a submission to FSANZ on *Application A1074 Minimum L-histidine in Infant Formula Products* made by Nestle Australia Limited and Nestle New Zealand Limited.

Heinz supports the application to reduce the minimum required level of L-histidine in infant formula products from 12mg/100kJ to 10mg/100kJ in the *Australia New Zealand Food Standards Code (the Code)*.

The FSANZ Comparative Nutritional Safety Assessment has reviewed the scientific evidence to show that the minimum requirement of 10mg/100kJ for L-histidine in an infant formula product is comparable with the average level of L-histidine in breast milk. It also concluded that a minimum 10mg/100kJ of L-histidine is considered adequate to support the growth of a formula fed infant compared to breast fed infants.

The proposed required minimum of 10mg/100kJ for L-histidine is consistent with the L-histidine requirements in the relevant international Codex and European Commission infant formula standards. Recent recommendations by an international expert panel reviewing compositional standards for follow-up formula supported a minimum histidine content of 38mg/100kcal (approximately 9.1mg/100kJ).

Heinz supports the FSANZ draft variations to reduce the minimum required level of L-histidine to 10mg/100kJ in clauses 22 and 32 of Standard 2.9.1 *Infant Formula Products* for infant formula, follow-on formula and infant formula products for special dietary use.

For further information, please contact:

Christine Weaver
Infant Nutrition Specialist ANZ
H.J. Heinz Co. Australia Ltd.
Locked Bag 2
South Melbourne VIC 3205
Australia

References:

Australia New Zealand Food Standards Code, Standard 2.9.1 Infant Formula Products

Codex Stan 72 – 1981 Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (Revised 2007. Amended 2011). Codex Alimentarius.

European Union Commission Directive 2006/141/EC of 22 December 2006 on infant formulae and follow-on formulae and amending Directive 1999/21/EC. 2006 European Commission.

Koletzko, B., Bhutta, Z. A., Cai, W., Cruchet, S., Guindi, M. E., Fuchs, G. J., Goddard, E. A., van Goudoever, J. B., Quak, S. H., Kulkarni, B., Makrides, M., Ribeiro, H., Walker, A. (2012). Compositional Requirements of Follow-Up Formula for Use in Infancy: Recommendations of an International Expert Group Coordinated by the Early Nutrition Academy. *Annals of Nutrition and Metabolism*. doi: 10.1159/000345906

Marketing in Australia of Infant Formulas: Manufacturers and Importers Agreement (The MAIF Agreement) 1992. Published by Commonwealth Department of Health and Ageing, April 2003.
http://www.health.gov.au/internet/main/publishing.nsf/Content/health-publth-publicat-document-brfeed-maif_agreement.htm

The Infant Nutrition Council Code of Practice for the Marketing of Infant Formula in New Zealand. Infant Nutrition Council, November 2012
http://infantnutritioncouncil.com/wp-content/uploads/2012/11/48511-INC-A5-booklet_FA-web.pdf

WHO International Code of Marketing of Breast-milk Substitutes. World Health Organisation, Geneva 1981.
<http://www.who.int/nutrition/publications/infantfeeding/9241541601/en/index.html>