

Australian Food and Grocery Council SUBMISSION

DECEMBER 2012

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
APPLICATION A1074 – MINIMUM L-HISTIDINE IN INFANT
FORMULA PRODUCTS



Australian Food and Grocery Council

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover in the 2010-11 financial year of \$110 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

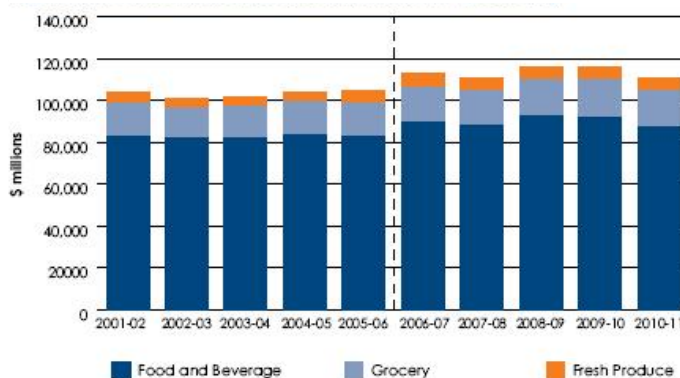
This diverse and sustainable industry is made up of over 22,600 businesses and accounts for over \$49 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. The industry spends \$466.7 million a year on research and development.

The food and grocery manufacturing sector employs more than 296,300 Australians, representing about 3 per cent of all employed people in Australia, paying around \$11.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 1. Composition of the industry's turnover (\$2010-11)



Source: Based on ABS, catalogue number 8221.0 and 8159.0

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au

1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the call for submissions for Application A1074 – *Minimum L-histidine in Infant Formula Products*.

AFGC notes this application seeks to reduce the minimum requirement for L-histidine in infant formula products from 12 mg/100 kJ to 10 mg/100 kJ in the *Australia New Zealand Food Standards Code* (the Code). The request relates to all infant formula products regulated in Standard 2.9.1 – Infant Formula Products of the Code, specifically infant formula, follow-on formula and infant formula products for special dietary use.

2. AFGC POSITION

The AFGC supports breastfeeding as the recommended way to feed a baby. When an infant is not breastfed, a safe and nutritious substitute for breast milk is needed. The only suitable and safe alternative is a scientifically developed infant formula product.

The AFGC **supports** this application on the basis that FSANZ considers it appropriate to reduce the minimum required level of L-histidine in infant formula products from 12 mg/100 kJ to 10 mg/100 kJ, as requested by the Applicant.

The reduced minimum level is comparable to the *average* L-histidine content of breast milk and is considered adequate to support the growth of formula-fed infants.

The AFGC supports international consistency in regulation to reduce the potential for trade barriers and additional cost and regulatory burden to manufacturers and suppliers in Australia and New Zealand and to support innovation. AFGC agrees that amending the Code would provide consistency between the Code and international and overseas food standards.

AFGC Recommendation - support Option 1:

To prepare draft variations to Standard 2.9.1 to reduce the minimum requirements for L-histidine in infant formula products from 12mg/100kJ to 10mg/100kJ.

3. GENERAL COMMENT

AFGC has a close relationship with the Infant Nutrition Council (INC) and supports the aim of INC to:

“Improve infant nutrition by supporting the public health goals for the protection and promotion of breastfeeding and, when needed, infant formula as the only suitable alternative”³

The AFGC launched a new partnership in November between the Healthier Australia Commitment (HAC) and INC which will help employers provide more support to breastfeeding mothers in the workplace.

Under the three year partnership, the HAC (an initiative of AFGC) and INC will develop the Baby Feeding Program (BFP) which will work to:

- Promote healthy lifestyles for all Australian families, in particular by supporting the public health goals for the protection and promotion of breastfeeding and when needed, infant formula as the only suitable alternative;
- Develop relevant resources to assist workplaces to support their employee mothers to successfully combine work and motherhood by implementing a breastfeeding supportive environment in the workplace; and
- Provide information in relation to infant nutrition.

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³ <http://infantnutritioncouncil.com/about-us/>

Australian Food and Grocery Council

MEMBER LIST AS AT 19 December 2012

Full Members

- Arnott's Biscuits Ltd
- Australian Blending Company Pty Ltd
- Barilla Australia Pty Ltd
- Beak and Johnston Pty Ltd
- Beechworth Honey Pty Ltd
- Beerenberg Pty Ltd
- Bickfords Australia Pty Ltd
- Birch and Waite Foods Pty Ltd
- Body Science International Pty Ltd
- Bronte Industries Pty Ltd
- Buderim Ginger Limited
- Bulla Dairy Foods
- Bundaberg Brewed Drinks Pty Ltd
- Bundaberg Sugar Ltd
- Byford Flour Mills/Millers Foods
- Byron Food Science
- Campbell's Soup Australia
- Canon Foods
- Cantarella Bros Pty Ltd
- Carman's Fine Foods
- Cerebos (Aust) Ltd
- Cheetham Salt Limited
- Christie Tea Pty Ltd
- Church & Dwight (Australia) Pty Ltd
- Clorox Australia Pty Ltd
- Coca-Cola Amatil Ltd
- Coca-Cola South Pacific Pty Ltd
- Colgate-Palmolive Pty Ltd
- Coopers Brewery Ltd
- D.E Coffee & Tea Retail Australia/Sara Lee Coffee & Tea Retail Australia
- Danisco Australia Pty Ltd
- Devro Pty Ltd
- DSM Food Specialties Australia Pty Ltd
- Eagle Boys Pizza
- Earlee Products Pty Ltd
- Epicurean Products Pty Ltd
- Ferrero Australia Pty Ltd
- Fibrisol Service Australia Pty Ltd
- Fontterra Australia Pty Ltd
- Food Spectrum Group
- FPM Cereal Milling Systems Pty Ltd
- Freedom Foods Group
- Frucor Beverages (Australia) Pty Ltd
- General Mills Australia Pty Ltd
- George Weston Foods Ltd
- GlaxoSmithKline Consumer Healthcare
- Go Natural
- Goodman Fielder Limited
- H.J. Heinz Company Australia Limited
- Harvest FreshCuts Pty Ltd
- Healthy Snacks Australia Pty Ltd
- Hoyt Food Manufacturing Industries Pty Ltd
- Hungry Jack's Australia
- Igea Group
- Jalna Dairy Foods Pty Ltd
- JBS Australia Pty Limited
- Jireh International Pty Ltd
- Johnson & Johnson Pacific Pty Ltd
- Kellogg (Aust) Pty Ltd
- Kerry Ingredients Australia Pty Ltd
- Kimberly-Clark Australia Pty Ltd
- Kitchens of Sara Lee
- Kraft Foods Limited
- Laucke Flour Mills Pty Ltd
- Lindt & Sprungli Australia
- Lion Dairy and Drinks Pty Ltd
- Madura Tea Estates
- Manildra Harwood Sugars
- Mars Chocolate
- McCain Foods (Aust) Pty Ltd
- McCormick Foods Australia Pty Ltd
- McDonald's Australia Ltd
- Merisant Australia Pty Ltd
- Metarom Australia P/L
- Mrs Mac's Pty Ltd
- Murray Goulburn Co-operative Co Ltd
- Myosyn Industries Pty Ltd
- Nerada Tea Pty Ltd
- Nestle Australia Ltd
- Nutricia Australia Pty Ltd
- Ocean Spray International, Inc
- Only Organic 2003 Pty Limited
- Parmalat Australia Ltd
- Patties Foods Ltd
- Pfizer Consumer Healthcare
- Popina (Vic) Pty Ltd
- Procter & Gamble Australia Pty Ltd
- QSR Holdings
- Queen Fine Foods Pty Ltd
- Reckitt Benckiser (Australia) Pty Ltd
- Red Bull Australia Pty Limited
- Rosella Foods Pty Ltd
- Sandhurst Fine Foods Australia
- Sanitarium Health and Wellbeing Company
- SC Johnson & Son Pty Ltd
- SCA Hygiene Australasia Pty Ltd
- Sensient Technologies (Australia) Pty Ltd
- Simplot Australia Pty Ltd
- Solaris Paper Pty Ltd
- Spicemasters Australia Pty Ltd
- Steric Pty Ltd
- Stuart Alexander & Co Pty Ltd
- Subway Franchisee Advertising Fund Australia/NZ
- Sugar Australia Pty Ltd
- SunRice
- Swisse Vitamins Pty Ltd
- Tasmanian Flour Mills Pty Ltd
- Tate & Lyle ANZ Pty Ltd
- The Smith's Snackfood Company
- The Vege Chip Company
- The Wrigley Company Pty Limited
- Tixana Pty Limited
- Unilever Australasia
- Vital Health Foods (Australia) Pty Ltd
- Ward McKenzie Pty Ltd
- Yakult Australia Pty Ltd
- Yum! Restaurants Australia Pty Ltd
- Australian Pork Limited
- Baker & McKenzie
- Benchmarking for Performance(B4P)
- Bizcaps Pty Ltd
- Brisbane Marketing
- CHEP Asia - Pacific
- CROSSMARK Asia Pacific
- CSIRO Food and Nutritional Sciences
- Dairy Australia
- Ettlin International Pty Ltd
- Food Allergen Control Training Analysis(FACTa)
- Food Liaison Pty Ltd
- Foodbank Australia Ltd
- Grain Growers Ltd
- Grant Thornton
- GS1 Australia Ltd
- IBM Australia Ltd
- Invest Queensland
- King & Wood Mallesons
- KPMG
- Legal Finesse
- Linfox Australia Pty Ltd
- Logan City Council
- Meat and Livestock Australia
- Monsanto Australia Ltd
- New Zealand Trade and Enterprise
- Pacific Strategy Partners
- PINCHme Australia Pty Ltd
- Red Rock Consulting
- Rentokil Initial Pty Ltd (Rentokil Pest Control)
- RQA Product Risk Institute
- S A Partners LLP
- Simons Green Energy Pty Ltd
- Six Degrees Executive Pty Ltd
- Spectrum Automation
- StayinFront Group Australia
- Strikeforce Alliance Pty Ltd
- Swire Cold Storage
- Swisslog Australia Pty Ltd
- Tetra Pak Marketing Pty Ltd
- The Food Group Australia
- The Nielsen Company
- Touchstone Consulting Australia Pty Ltd
- Visy Pak
- Wiley & Co Pty Ltd

Affiliate Members

- Australian Self-Medication Industry
- Association of Sales and Marketing Companies Australasia
- Baking Associations Australia
- CropLife Australia Limited
- Food & Beverage Importers Association
- Food Industry Association Qld Inc
- Food Q Inc
- Foodservice Suppliers Association of Australia
- Grains & Legumes Nutrition Council
- Private Label Manufacturers Association Australia/New Zealand



one voice - adding value