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To FSANZ: submissions@foodstandards.gov.au.

SUBMISSION

FSANZ Proposal P1039 Microbiological Criteria for Infant Formula

Submitter:

Dairy Goat Co-operative (N.Z.) Ltd
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New Zealand

Level at which submission authorised: authorised by Product Compliance Manager and Quality Manager

Contact persons:

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[REDACTED] Regulatory and Technical Liaison Manager ([REDACTED])
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Information regarding the submitter

Dairy Goat Co-operative (N.Z.) Ltd, (abbreviated as 'DGC'), is a New Zealand manufacturer, developer and exporter of premium consumer packaged nutritional powders primarily for infants and young children. It is a leading New Zealand exporter, and services approximately 20 international markets via its marketing partner and joint venture relationships. The markets are located primarily in Asia, Europe and Oceania.

DGC's overall position

DGC supports the recommendations of this FSANZ proposal. As an associate member of the Infant Nutrition Council Ltd (abbreviated as 'INC'), DGC also supports the submission and comments prepared by the INC in relation to FSANZ proposal P1039.

In addition to comments provided by the INC, DGC would like to make a suggestion outlined below for FSANZ's consideration to enable clarity in the application of the proposed microbiological criteria.

Suggested additions to proposed schedule 27, section S27-2 (definitions)

DGC would like to propose the addition of definitions to schedule 27, section S27-2, as shown in red below, to help clarify the application of the proposed microbiological criteria:

S27—2 Definitions

Note In this Code (see section 1.1.2- 2):

SPC means a standard plate count at 30°C with an incubation time of 72 hours.

In this Schedule:

processed, in relation to egg product, means pasteurised or subjected to an equivalent treatment.

Powdered infant formula, means a powdered formula suitable for infants from 0-6 or 0-12 months.

Powdered follow-on formula, means a powdered formula suitable for infants from 6-12 months.

Rational for the above suggestion:

The current definitions in the Code for infant formula and follow-on formula (see below) can be taken as having an overlap in age range since infant is defined as a person under the age of 12 months. The addition of definitions to schedule S27 could help avoid uncertainty in the application of the microbiological criteria and ensure that infant formulas suitable for infants from 0-6 or 0-12 months are tested in accordance with the relevant criteria.

Current definitions in the Code for infant formula and follow-on formula:

“follow-on formula means an infant formula product that:

- (a) is represented as either a breast-milk substitute or replacement for infant formula; and
- (b) is suitable to constitute the principal liquid source of nourishment in a progressively diversified diet for infants from the age of 6 months.

infant formula means an infant formula product that:

- (a) is represented as a breast-milk substitute for infants; and
- (b) satisfies by itself the nutritional requirements of infants under the age of 4 to 6 months.+

It is possible that the infant and follow-on formula definitions may be reviewed under FSANZ proposal P1028. This should not represent an issue as any additional text, as suggested above, could be amended if appropriate when P1028 changes are implemented.