



30th September 2014

Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143

Submission for Proposal P1030 Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks

The New Zealand Juice and Beverage Association (NZJBA) is the industry association representing the interests of manufacturers, their franchisers and suppliers, of juice based beverages, carbonated/non-carbonated drinks and bottled water in New Zealand. Production by NZJBA bottler members equates to over 95% of all water and juice based beverages sold in New Zealand as well as products exported internationally.

A list of NZJBA members are attached as Appendix 2.

The NZJBA value the opportunity to review and comment on P1030 Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks.

NZJBA supports the FSANZ proposal P1030. This proposal provides industry with the opportunity to allow formulated supplementary sports foods (FSSFs), electrolyte drinks and electrolyte drink bases (EDs) to carry health claims consistent with their intended purpose and in accordance with Standard 1.2.7-Nutrition, Health and Related Claims. This will involve the transfer of EDs from Standard 2.6.2-Non-Alcoholic Beverages and Brewed Soft Drinks to Standard 2.9.4-Formulated Supplementary Sports Foods.

The NZJBA notes that this Proposal is intended to deliver an interim arrangement pending the future review of Standard 2.9.4, however it also serves to presently address a **major anomaly** under the existing provisions for EDs within the Code.

NZJBA would like to **recommend a change in wording** of the (4.2) Purpose statement to:

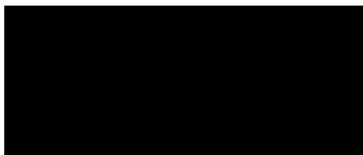
*This Standard defines and regulates the composition and labelling of foods **and electrolyte drinks** specially formulated to assist sports people in achieving specific nutritional or performance goals. Such foods **and electrolyte drinks** are intended as supplements to a diet rather than for use as the sole or principal source of nutrition.*

The NZJBA will support a legislative framework that will allow:

1. Food safety assurance
2. Continued manufacture and distribution of products formulated to existing standard
3. Innovation within the food industry
4. Support of worldwide trends
5. Meeting consumer demands

Should any further information or data be required, please do not hesitate to contact the undersigned.

Kind Regards



**Executive Director
New Zealand Juice & Beverage Association Inc**

APPENDIX 1: NZJBA Member List

BEVERAGE MEMBERS

[Barker's of Geraldine](#)
[Barwell Pacific Ltd](#)
[Beachview Products Ltd](#)
[Beaumont Organic Ltd](#)
[Coca-Cola Oceania Ltd](#)
[Coca-Cola Amatil NZ Ltd](#)
[Directus International Ltd](#)
[ENZAFOODS New Zealand Ltd](#)
Essentials Trading Ltd
[Frucor Beverages Ltd](#)
[Fruit Solutions Ltd](#)
[Fruit Squeeze Ltd](#)
[Glaxo SmithKline NZ](#)
[Greenways Orchards Ltd](#)
[International Flavors and Fragrances \(NZ\) Ltd](#)
[Ingredient Techniques NZ Ltd](#)
[James Crisp \(NZ\) Ltd](#)
Kerry Ingredients Ltd
[Kiwifruit Processing Co Ltd](#)
MMC Limited
Natural Sugars NZ Ltd
[Nekta Products Ltd](#)
[Phoenix Organics Ltd](#)
[Profruit \(2006\) Ltd](#)
[Relax NZ Ltd](#)
[RD2 International Ltd](#)
[Salkat New Zealand Ltd](#)
[Sensient Technologies](#)
[Simply Squeezed](#)
Steam Brewing Company
[The Better Drinks Co Ltd](#)
[Ti-Tonics Limited](#)
[Tradex Oceania Limited](#)
[Zebra Zoo Ltd](#)
[Zymus International Ltd](#)

WATER MEMBERS

[Alpha Aqua Ltd](#)
[Antipodes Water Company Ltd](#)
[Aquasplash Limited](#)
[Kauri Springs NZ Ltd](#)
[NZ Drinks Ltd](#)
[New Zealand Spring Water](#)
New Zealand Quality Waters Ltd
[Waiwera Water New Zealand Ltd](#)