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To whom it may concern,

Sports Dietitians Australia (SDA) is the peak body for evidence-based sports nutrition in Australia. Our members are Accredited Practicing Dietitians (APDs) who undertake further study and professional development to specialise in the practice of sports nutrition to become Accredited Sports Dietitians (AccSDs). Our members work across a range of settings including private practice, team sports (grass roots though to professional levels), elite/Olympic level sports and industry. A number of our members also work in academia including Associate Professors Ben Desbrow, Helen O'Connor and Gary Slater, whose research into caffeine sports supplements is cited on page 12 of the *Call for Submissions – Urgent Proposal 1054*.

SDA welcomes the initiative to reduce the risk associated with the consumption of highly concentrated caffeinated products, particularly given the risk can lead to health complications and even death. SDA however has serious concerns that a threshold of 5% would create a false sense of safety for consumers. Recent pre-workout supplement research as cited on page 12 of the *Call for Submissions – Urgent Proposal 1054* (Desbrow et al, 2018) showed that all existing products would fall well below this concentration (highest was 4.2% on average) yet it is known that consumption of products at this level has resulted in complications/fatalities (Andrade et al, 2018, Harris et al, 2017).

There is no ergogenic reason for caffeine levels to be above 2% and the recommended supplementation level as outlined in the 2018 IOC Consensus Statement for caffeine use in elite athletes, where maximal benefits are usually achieved is 3-6mg/kg of body mass (Maughan, R.J et al 2018). Larger caffeine doses (>9mg/kg/BM) do not appear to increase performance benefits (Maughan, et al 2018). SDA considers there to be a much greater risk of negative side effects associated with levels above 6mg/kg/BM and its members help to safely achieve performance benefits using specific and evidence based protocols. A limit of 5% runs the risk of being considered by some as a "green light" to increase existing levels to this amount and without appropriate guidance or expertise in monitoring caffeine intake, consumers are at risk of more serious and potentially fatal health outcomes across numerous settings – see example news reading [here](#).

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For non-elite athletes, Accredited Sports Dietitians recommend a lower limit at the range of 1-3mg/kg of body mass. The threshold of caffeine toxicity appears to be around 400 mg/day in healthy adults (19 years or older), 100 mg/day in healthy adolescents (12–18 years old), and 2.5 mg/kg/day in healthy children (less than 12 years old) (Temple, J.L, et al 2017).

Regardless of an athlete's level of activity, due to each individual's needs, circumstances and health considerations, SDA advocates that any sports supplementation, including caffeine use, is conducted under the guidance of an Accredited Sports Dietitian.

SDA therefore recommends the revised maximum limit for all foods be 2% concentration and that caffeine supplementation for sports is conducted under the guidance of an Accredited Sports Dietitian.

If you require any clarification or information, please contact [REDACTED]

Yours sincerely,

[REDACTED]

References:

Andrade et al, 2018, *Dangerous mistake: an accidental caffeine overdose;*

Desbrow et al, 2018 *Caffeine content of pre-workout supplements commonly used by Australian consumers*

Maughan et al, 2018 *IOC consensus statement: dietary supplements and the high-performance athlete*

Harris et al, 2017, *Hemorrhagic stroke in a young healthy male following use of pre-workout supplement Animal Rage XL*

Temple et al, 2017 *The Safety of Ingested Caffeine: A Comprehensive Review*