FOOD TECHNOLOGY ASSOCIATION
OF VICTORIA INC
(FTA VICTORIA)
P O BOX 82, DEEPDENE DELIVERY CENTRE, 3103
(P) (03) 9836 5777 (F) (03) 9836 5888

18 December 2001

Attention: **Project Manager: Proposal P242**

Australia New Zealand Food Authority,
Box 7186,
Canberra Mail Centre
ACT, AUSTRALIA, 2610.

6.2.4. Re: Foods for Special Medical Purposes

With reference to our E-mail request to the Standards Liaison Officer of 28 November 2001 to revise our original submission of 18 October 2001, FTA Victoria has reviewed this Proposal and endorses the following comments of the Technical Sub Committee:

A spokesperson, representing the four major industry marketers of these types of products, contacted the Technical Secretary and requested that FTAV TSC reconsider its submission to ANZFA; refer to letter dated 18 October 2001 in which TSC recommended acceptance of Option 5.

P242 was drafted due to these products being available and used for many years but there was no adequate Food Standard or provision within Therapeutic Goods Administration.

It would appear that these current products would be subjected to the new Standard that may create problems for the producers, marketers and consumers. This latter group should be the main consideration of the new Standard as they are reliant on these products for their continuing health.

The Committee considered that they should endorse their original submission of Option 5 – pre-market notification and clearance. However current FSMP products used within Australia and New Zealand should be regarded as having been already notified and pre-cleared and not subjected to this Standard when it is finally gazetted.

Moreover the Committee considered that the proposed Standard would have been originally drafted so as to permit adequately the current FSMP products. This rationale could be compared to the creation of Standard R9 – Supplementary Foods, specifically Supplemented Drink and Drink Base which was designed to cover existing market products not covered by any standard.

Although the Committee supports the unequivocal acceptance of current products, it does not agree with the proposed industry position statement (of the 4 major international companies) of supporting Option 3.

We would appreciate being maintained on the circulation list for any further changes in this matter and to receiving notification of the next step concerning this Proposal.

Yours sincerely,

[redacted]

PRESIDENT – FTA VICTORIA

ACKNOWLEDGED

ENTERED IN DATABASE
21/12/2001

54

P49

FOOD TECHNOLOGY ASSOCIATION OF VICTORIA INC

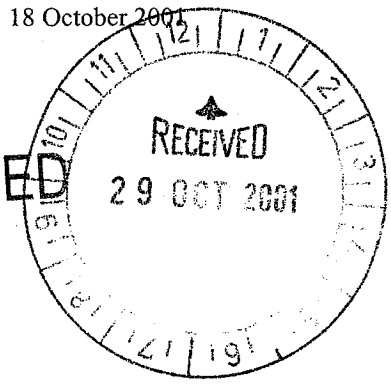
(FTA VICTORIA)

P O BOX 82, DEEPDENE DELIVERY CENTRE, 3103

(P) (03) 9836 5777 (F) (03) 9836 5888

ENTERED IN DATABASE
29/10/01

18 October 2001



Attention: **Project Manager: Proposal P242**

Australia New Zealand Food Authority,
Box 7186,
Canberra Mail Centre
ACT, AUSTRALIA, 2610.

ACKNOWLEDGED

Re: Foods for Special Medical Purposes:

FTA Victoria has reviewed this Proposal and endorses the following comments of the Technical Sub Committee:

After much discussion the Committee considered that Option 5 – Regulation by means of pre-market notification would be acceptable due to the following rationale:

a) It is considered a daunting if not impossible task to draft a Standard that could cover all the possible products that would be permissible when this Standard is gazetted.
b) A prescriptive Standard would stifle innovation and could not predict all future developments in this quasi-medical field.
c) Without pre-clearance by a statutory organisation there could be confusion at the food- therapeutic interface.
d) The range of possible consumers, albeit in limited groups, is very wide and all have specific needs and hence require flexibility in the range of possible products.
e) The preparation of any associated Code of Practice would of necessity be very general and could allow products onto the market that could be detrimental to vulnerable consumers.
f) Pre-clearance allows the Standard to be introduced without the need for constant revision to meet unforeseen eventualities.
g) Any claims and statements would require approval prior to commercialization.

We would appreciate being maintained on the circulation list for any further changes in this matter and to receiving notification of the next step concerning this Proposal.

Yours sincerely,

[redacted]

PRESIDENT – FTA VICTORIA