

12 November 2013

Project Manager  
Proposal P274  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear sir/madam,

Proposal P274 – Minimum Age Labelling of Foods for Infants

Consultation Paper

This is in response to the October 2013 Consultation Paper for Proposal P274 – Minimum Age Labelling of Foods for Infants.

By way of background, the Food & Beverage Importers Association (“FBIA”) is an industry association that represents importers into Australia of food and beverages, both retail ready and ingredients for further processing.

The FSANZ Consultation Paper states that the proposed approach of FSANZ is to amend Standard 2.9.2 so that the youngest minimum age labelling permitted on the label of infant food would be prescribed as ‘around 6 months’ on infant food that is intended to be introduced in the first stage of weaning an infant i.e. a ‘first food’.

The FBIA does not support this approach and favours the retention of the current approach set out in Standard 2.9.2.

We have read the submission prepared by the Australian Food & Grocery Council and fully agree with its arguments against changing from the status quo. Specifically, we are concerned with the trade implications of the FSANZ approach. While there may not be international consistency on minimum age labelling requirements for infant foods, the proposed approach is inconsistent with major trading partners, the EU and the USA and so, will restrict the availability of products from those sources for the Australian market

**Food & Beverage Importers Association**

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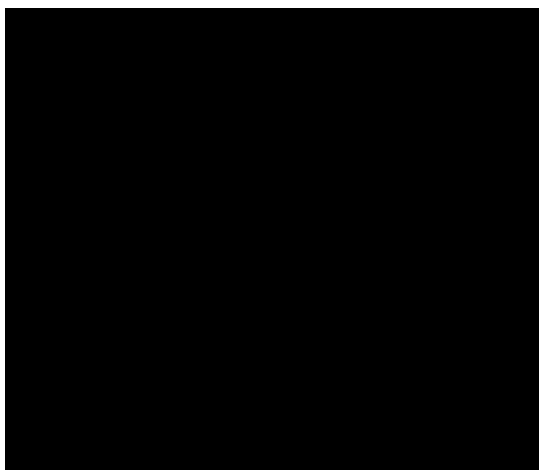
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In addition, we are concerned that FSANZ may have significantly underestimated the cost to industry of the labelling and associated costs with the proposed change, even allowing for the 2 year transition period and stock in trade provisions. We believe that there should be a complete regulatory impact statement before the proposed approach is adopted.

Should you have any questions on these comments, please do not hesitate to contact me

Yours faithfully,



A J Beaver  
Secretary