Dairy Australia

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02 September 2021

Food Standards Australia New Zealand
Email: standards.management@foodstandards.gov.au.

Re. Proposal P1028 Infant Formula Products CP2 – Nutrient Composition

Dear Standards Management

Dairy Australia the national services body for the Australian dairy industry and supports the profitability and sustainability of dairy farming, welcomes this opportunity to comment on Food Standards Australia New Zealand's (FSANZ) Call for submissions – Proposal P1028 Infant Formula Products CP2 – Nutrient Composition.

The dairy industry fully supports breast feeding as the best option for infants, however recognises that infants that cannot or are not breast fed must have access to safe and nutritionally suitable food.

Dairy Australia sits on the Infant Nutrition Council (INC) Scientific Regulation Committee as an observer and for the most part, supports the INC position as stated in its submission. Comments below relate to points most relevant for the dairy industry in relation to the nutrient composition of Infant Formula Products.

Comments

Protein

- Dairy Australia supports Option 1 (adopt 6.25 as the nitrogen conversion factor (NCF)) for all protein sources for calculation of protein content such that it be updated to align with the full Codex STAN 72-1981 NCF footnote. However, it does not support that whey-based infant formula is distinguished from other dairy infant formula in the choice of NCFs.
- Dairy Australia continues to support a holistic view of total protein, acknowledging that dairy protein has total nutritional benefits not just its protein components individually. The rationale FSANZ has applied in distinguishing NCFs in whey-based from other dairy formula is not clear. Such an approach was not outlined in the 2019 JEMNU Expert Panel recommendations. In addition, we refer to a paper by Elgar et ali with a specific focus on a range of commercial whey products using different methods for protein determination. This continues to highlight that an NCF for whey ingredients is similar to other dairy products.
- If FSANZ was to proceed with Option 2, Dairy Australia would only support this approach if whey vs. other dairy formula NCFs were not distinguished. In this case support we would support that 6.38 or 6.25 to be used for all dairy formula, regardless of whey-based or other dairy-based formula.

Protein source

- New plant-based proteins have been of considerable interest over the past several years and with dairy proteins among the best quality alternatives when human milk is not an option, Dairy Australia supports FSANZ's proposed approach to prescribe permitted protein sources for non-mammalian protein sources.

Iodine

- Dairy Australia supports aligning the iodine minimum and maximum to the Codex STAN 72-1981 level of 2.5 to 14 µg/100kJ, but as a GUL, not as a maximum. Manufacturers will otherwise have difficulty meeting the proposed tighter range.

L-Carnitine

- Dairy Australia is in agreement with FSANZ's view that L-carnitine should be mandatory
- However, the inclusion of a maximum is of concern due to the natural variation in L-carnitine content of milk.
- Dairy Australia supports this being removed to align with Codex and the EU.

Yours sincerely

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[i] Elgar F et al. Comparison of analytical methods for measuring protein content of whey protein products and investigation of influences on nitrogen conversion factors. Int J Dairy Sci. 2020 April;73(4): 790-794.