

29 May 2018

Project Manager
Food Standards Australia New Zealand
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NEW ZEALAND

Email: submissions@foodstandards.gov.au

Dear Sir/Madam

I refer to the ***Call for submissions – Urgent Proposal P1046: Assessment of the Variation.***

The New Zealand Food & Grocery Council (NZFGC) made a submission on 28 August 2017 at the time this matter was first raised for consultation under urgency. At that time, NZFGC strongly supported the addition of acetate forms of L-amino acids (L-arginine, L-histidine and L-ornithine) to the existing permission of L-lysine acetate. We commended FSANZ for taking the opportunity to assess the acetate forms of all the L-amino acids (rather than the single one requested for addition) to reduce the prospect of the need for an urgent proposal being raised for this group of substances in the future and as an efficient use of FSANZ's resources.

Nothing, in our view, has emerged to change our position. The health and safety of a vulnerable group of the population (those with special dietary needs for serious or life threatening conditions) is paramount and by anticipating future needs where time may be even more critical, unnecessary delays will be avoided. At the same time, both industry and government resources will have been saved.

NZFGC therefore strongly supports the re-affirmation of the variation that has resulted in the addition of acetate forms of L-amino acids (L-arginine, L-histidine and L-ornithine) to previous permissions of L-lysine acetate. This will ensure that importation of foods for special medical purposes containing these substances will continue and that consumers who need them will continue to have access to them.

Yours sincerely