



**Submission to**  
**Food Standards Australia New Zealand**  
Consultation paper 3 –  
Regulatory framework and definitions  
Proposal P1028—Infant formula

8<sup>th</sup> October 2021



## **Introduction**

This submission on behalf of Danisco Australia and Danisco New Zealand, is made in response to Consultation paper 3 – Regulatory framework and definitions, Proposal P1028—Infant formula.

## **Danisco/IFF**

Danisco operates in both Australia and New Zealand as subsidiaries of International Flavors and Fragrances Inc (IFF), manufacturer/marketer of specialty food ingredients (including plant proteins), food additives, flavourings and food processing aids.

Upon consideration of the topics discussed in Consultation Paper 3 we welcome the opportunity to provide comment, to Food Standards Australia New Zealand on the Regulation of Infant Formula Products (IFP) in respect of nutrient composition.

## **General Comment**

IFF supports the primary objective of FSANZ's P1028 review to protect public health and safety. We also agree with the premise that infant formula must be safe for formula-fed infants to consume, and its nutrient composition must support normal growth and development when used as the sole or principal source of nutrition up to 12 months of age

It is also our general position that the FSANZ Standard 2.9.1 Infant Formula products should, where FSANZ's primary objectives are satisfied, harmonise with international standards notably Codex Infant Formula Standard (Codex STAN 72-1981), the draft revisions to the essential composition of the Codex STAN 156-1987 Standard for Follow-Up Formula as well as the 2016 EU Regulation on Infant Formula (EU 2016/127).

Our comments to follow are addressed specifically to Section 2 of CP-3 consideration of novel foods and nutritive substances.

## **Confidentiality**

In our response below certain commercially sensitive and therefore confidential information is identified in Section 2.2 below, and provided in Annex A. This section of the response is regarded by IFF as **Confidential Commercial Information** and is provided in the submission strictly on this basis. This information is the result of a significant research and development effort, and investment by the submitter; it is not in the public domain and is considered as either proprietary or commercially sensitive. It would be disadvantageous to IFF if this information were released into the public domain.

## **Section 2 Novel Foods and Nutritive substances**

### **2.1 Pre-market assessment requirements**

IFF supports the proposed approach of FSANZ not to proceed with a separate review of novel foods and nutritive substances applicable to IFP under P1028. We would agree that this approach would avoid inconsistencies and regulatory ambiguity that could be introduced if P1028 considered novel foods and nutritive substances in isolation of P1204.

## **2.2 Novel Foods – Schedule 25 (Commercial in confidence)**

FSANZ have asked the question:

**To manufacturers, please provide information on whether the substances listed in Table 5 are used in infant formula products, food for infants and formulated supplementary food for young children?**

Please see Annex A (Commercial in confidence) for IFF's response to this question. We deem the material provided in Annex A to be commercially sensitive and therefore request it not be made publicly available.