



## Complementary Medicines Australia Submission to FSANZ Proposal P1028 – Infant Formula: Consultation Paper 3 2021 – Regulatory Framework

Complementary medicines Australia (CMA) is the peak body representing the complementary medicines and health foods products sector supporting Australian jobs, research, manufacturing and exports by meeting community demand for preventative and complementary healthcare. CMA represents sponsors, manufacturers, suppliers and retailers of complementary medicines, nutritional food products, sports supplements, infant formula and other concentrated foods for health purposes. CMA supports access through appropriate and balanced risk-based regulation, while contributing to skilled local employment, health enhancement and preventative health strategies to help Australians live healthier lives.

CMA supports the ongoing review of Food Standards in order to maintain currency; to align with comparable overseas regulation where practicable; and to ensure safety for consumers.

### Proposal P1028 – Regulatory Framework - Background

Proposal P1028 focuses on issues relating to the safety and food technology of infant formula, from manufacture of the product to preparation by caregivers. The purpose of the Proposal is to revise and clarify standards relating to infant formula (for use from birth to <12 months of age) comprising category definitions, composition, labelling and representation of products. The aim of this proposal is to ensure regulation of infant formula is clear and reflects the latest scientific evidence.

The third paper discusses regulatory options for Standard 2.9.1 and Schedule 29 and the focus of this paper is the regulatory framework particularly for special infant formulas or infant formula products for special dietary use (IFPSDU) under the current provision in the Code.

FSANZ has provided that, although the standards for infant formula are, on the whole, functioning adequately, there is scope to improve the clarity of some standards, and to consider the application of Ministerial policy guidance and alignment with international regulations.

### CMA summary position

CMA supports the **Infant Nutrition Council's position on Proposal P1028 Paper 3 – Regulatory Framework.**

CMA appreciates the opportunity to provide feedback on FSANZ Proposal P1028-Infant Formula – Nutrient composition. Please do not hesitate to contact us for further feedback on specific technical matters or industry implementation considerations.

