

National Allergy Strategy Submission - Proposal P1028: Infant formula

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Submission

Special Medical Purpose Products for Infants (SMPPi)

- The National Allergy Strategy supports the creation of a new category – Special Medical Purpose Products for infants) within Standard 2.9.1.
- There is concern however, that SMPPi appear to be exempt from ingredient labelling. The declaration of ingredients is important for infants with food allergies but also those with allergy-related gastrointestinal disorders.
- The National Allergy Strategy seeks clarification that rice-based infant formulas intended for the dietary management of food allergy would be categorised as SMPPi.
- The National Allergy Strategy supports that SMPPi products comply with the allergy declaration requirements of Standard 1.2.3.

Foods for Special Medical Purposes

- The National Allergy Strategy supports the requirement for labelling, including allergen labelling, of inner packages of Foods for Special Medical Purposes.
- Ingredient listing should also be a requirement.

Low lactose and lactose-free formulas

- As previously submitted, the National Allergy Strategy has concerns that low lactose and lactose-free formulas may be given to infants with cow's milk (dairy) allergy. Surveys conducted with staff working in children's education and care services indicates that 25% of respondents used lactose-free formula as an alternative infant formula for infants with cow's milk allergy (National Allergy Strategy, 2021, unpublished data).
- As such, we recommend a warning statement indicating on low lactose and lactose-free formulas indicating that they are not suitable for infants with cow's milk (dairy) allergy.

Partially hydrolysed protein formulas

- The National Allergy Strategy supports partially hydrolysed formulas being categorised as SMPPi.
- The National Allergy Strategy also supports that any claim that partially hydrolysed formula is effective in the prevention or mitigation of allergy would not be permitted as a health claim.

Additional foods

- The National Allergy Strategy recommends that the statement regarding offering additional foods should be consistent with the Australasian Society of Clinical Immunology and Allergy (ASCIA).
- ASCIA recommends that foods be offered at around 6 months but not before 6 months.

The National Allergy Strategy has viewed the Allergy & Anaphylaxis Australia submission and supports the recommendations made in those submissions