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3 October, 2001

Project Manager – Proposal P236
Australia New Zealand Food Authority
P O Box 10559
The Terrace
Wellington 6036

Dear Sir/Madam

PROPOSAL P236 – DEVELOPMENT OF JOINT FOOD REGULATION FOR SPORT FOODS

Attached please find the submission made on behalf of Auckland District Health Board's Public Health Nutrition and Food Teams.

Enclosed is a copy only of the submission already made by [REDACTED] [REDACTED] – all expert dietitian/nutritionists in this specialised area. We support their submission in the areas of labelling and content.

Yours faithfully

[REDACTED]

Public Health Nutritionist

SUBMISSION ON PROPOSAL 236 – DEVELOPMENT OF JOINT FOOD REGULATIONS FOR SPORT FOODS

INTRODUCTION

Auckland District Health Board is New Zealand's largest and most comprehensive health care provider. It provides care at a local and regional level over a wide range of health services, including Health Protection and Public Health.

This submission is made on behalf of the Public Health Protection Nutrition Team and the Food Team, which includes Imported Foods.

SUBMISSION

The area of sports food is a specialist nutrition area, and as such this submission does not include analysis of the content of the products which would be controlled by the inclusion of this regulation. Rather it concentrates on the options for regulation, and our areas of concern.

We support the submission made by specialist sports nutritionists/dietitian's [redacted] in the specific areas of labelling and content of the products [copy attached FYI]

Policy Principles

We agree with these

Options for Regulation

Our preferred option is Option 2

Our reasons for supporting this option are as follows:-

- The NZ Dietary Supplement Regulations are outdated and not working, and urgently need to be repealed.
- The NZ Ministry of Health proposal to exclude food from the NZDSR is a beginning towards this necessary reform, and the repeal of the relevant provisions (Special Purpose Foods) within the NZFR is supported.
- The possibility of increased costs for enforcement are not considered a valid reason for not supporting this option. It is probable that costs of

enforcement would be decreased if there is only one piece of clear legislation as opposed to the current three in place.

- For the consumer, the only claims that should be allowed should be ones which can be substantiated, with sound scientific evidence, before an expert committee. Currently many products do not provide reliable information either on the product and/or in associated advertising and written material.
- The proposed standard should have sufficient inbuilt controls to prevent the sale and promotion of the products to children. This could include warning statements that the products are not suitable for children on both products and advertising material.