

05/03

20 November 2002

FINAL ASSESSMENT REPORT (s.36)

PROPOSAL P270

**AMENDMENTS TO STANDARD 2.9.2 – FOODS FOR
INFANTS: ELECTROLYTIC IRON AS A PERMITTED
FORM OF IRON; AND CLARIFICATION OF ‘JUICE’**

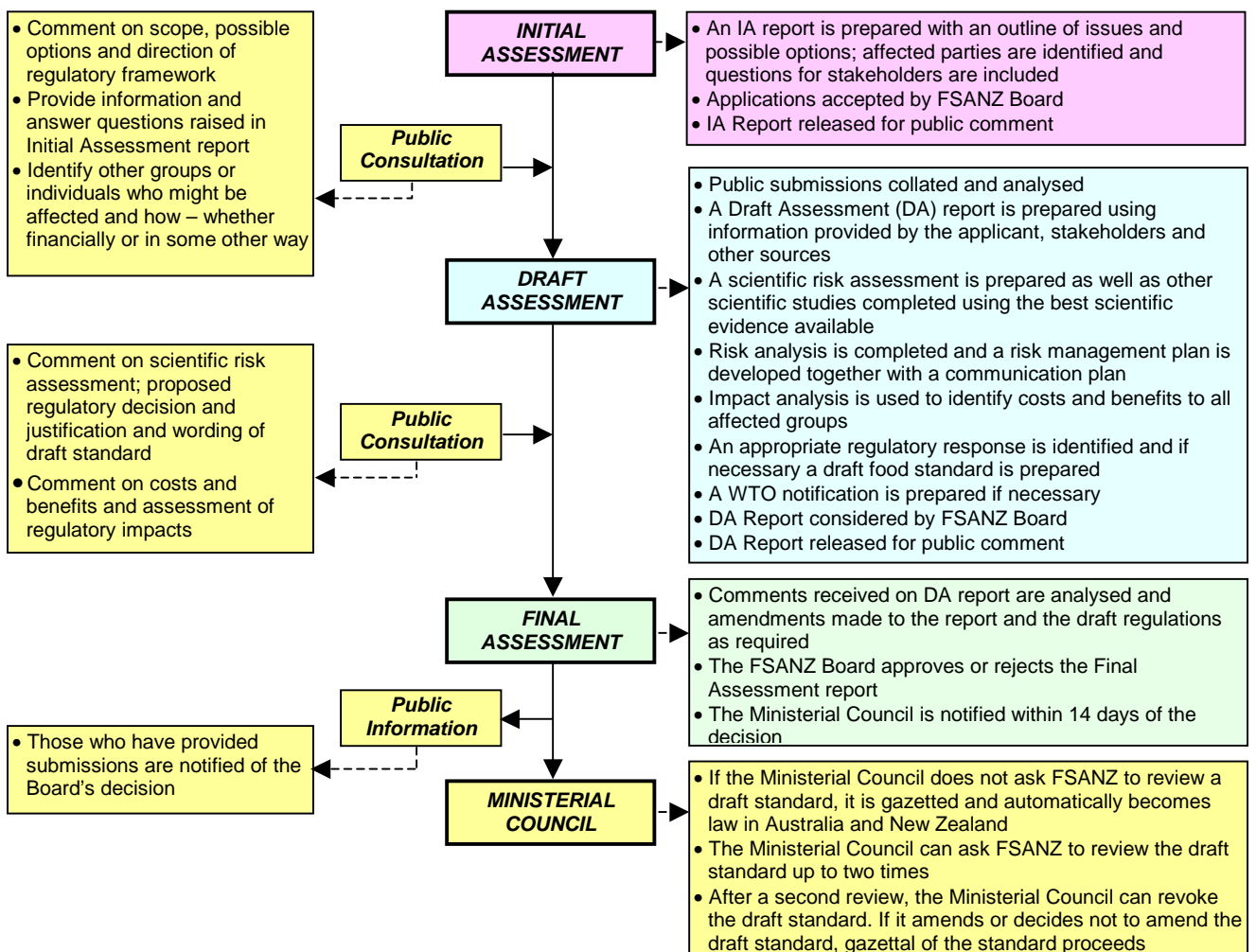
FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

FSANZ's role is to protect the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply. FSANZ is a partnership between ten governments: the Commonwealth; Australian States and Territories; and New Zealand. It is a statutory authority under Commonwealth law and is an independent, expert body.

FSANZ is responsible for developing, varying and reviewing standards and for developing codes of conduct with industry for food available in Australia and New Zealand covering labelling, composition and contaminants. In Australia, FSANZ also develops food standards for food safety, maximum residue limits, primary production and processing and a range of other functions including the coordination of national food surveillance and recall systems, conducting research and assessing policies about imported food.

The FSANZ Board approves new standards or variations to food standards in accordance with policy guidelines set by the Australia New Zealand Food Regulation Ministerial Council (Ministerial Council) made up of Commonwealth, State and Territory and New Zealand Health Ministers as lead Ministers, with representation from other portfolios. Approved standards are then notified to the Ministerial Council. The Ministerial Council may then request that FSANZ review a proposed or existing standard. If the Ministerial Council does not request that FSANZ review the draft standard, or amends a draft standard, the standard is adopted by reference under the food laws of the Commonwealth, States, Territories and New Zealand. The Ministerial Council can, independently of a notification from FSANZ, request that FSANZ review a standard.

The process for amending the *Food Standards Code* is prescribed in the *Food Standards Australia New Zealand Act 1991* (FSANZ Act). The diagram below represents the different stages in the process including when periods of public consultation occur. This process varies for matters that are urgent or minor in significance or complexity.



Final Assessment Stage

The Authority has now completed two stages of the assessment process and held one round of public consultation as part of its assessment of this proposal. This Final Assessment Report and its recommendations have been approved by the FSANZ Board and are now being reviewed by the Australia and New Zealand Food Regulation Ministerial Council (ANZFRMC).

If accepted by ANZFRMC, a change to Volume 2 of the *Food Standards Code* is published in the *Commonwealth Gazette* and the *New Zealand Gazette* and adopted by reference and without amendment under Australian State and Territory food law.

In New Zealand the New Zealand Minister for Health gazettes the food standard under the New Zealand Food Act. Following gazettal, the standard takes effect 28 days later.

Further Information

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Assessment reports are available for viewing and downloading from the FSANZ website www.foodstandards.gov.au or alternatively paper copies of reports can be requested from the Authority's Information Officer at info@foodstandards.gov.au including other general enquiries and requests for information.

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Executive Summary and Statement of Reasons

The purpose of this Proposal is to consider whether:

1. electrolytic iron should be reinstated as a permitted form of iron for addition to infant foods, particularly infant cereals; and
2. the meaning of the term 'juice' in the context of Standard 2.9.2 – Foods for Infants needs clarification.

This Final Assessment Report discusses issues raised in submissions and makes recommendations on draft variations to Volume 2 of the *Food Standards Code* (Attachment 1).

Regulatory Problem

Electrolytic iron

The currently permitted forms of iron (Standard R6, Volume 1 of the *Food Standards Code*, and Amendment 13 to the *New Zealand Food Regulations* 1984) used in fortification of infant cereal products have been inadvertently omitted from Volume 2 of the *Food Standards Code*. Without such permission, infant cereal products may become unavailable after the end of the transition period (December 2002) thus risking the nutritional health of weaning infants.

Clarification of the term 'juice'

The differing interpretations of 'juice' in Standard 2.9.2 and the resultant differences in the labelling of infant juice products is potentially misleading infant carers, and not promoting fair trading in foods. Standard 2.9.2 may be interpreted as allowing the label 'fruit juice', suitably qualified, to appear on diluted fruit juice products for infants, whereas Standard 2.6.2 - Non-Alcoholic Beverages and Brewed Soft Drinks requires such diluted products to be labelled as fruit drinks.

Objectives

In relation to iron in infant cereals, the key objective in assessing this Proposal relates to the protection of public health and safety, whereas in relation to the meaning of 'juice' for infants, the objectives relate to the prevention of consumer deception and promotion of fair trade.

Options

Two options have been considered – amend Volume 2 of the *Food Standards Code* to include electrolytic iron and ferrum reductum (reduced iron) as permitted forms of iron for addition to infant foods, and to clarify the meaning of 'juice' as it relates to infant juice products such that infant products are not labelled inappropriately as juice (Option 1); or do not amend Volume 2 (Option 2).

Impacts

Option 1 is the preferred option. This option will be cost effective and of net benefit to the food industry, infants and their carers.

Consultation

Under section 36 of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act) the Authority has decided to omit one round of public consultation as it is satisfied that the Proposal raises issues of minor significance and complexity only.

A total of 6 submissions were received in response to public consultation. A summary of submitter comments is at Attachment 2. All submitters supported the proposed amendments in relation to the permitted forms of iron for use in infant foods. All but one submitter supported the proposed amendment to clarify the meaning of 'juice' in relation to infant juice products. Issues raised in submissions are discussed in Section 5.3.2.

Conclusion and Statement of Reasons

Adoption of the proposed amendments to Volume 2 of the *Food Standards Code* to include electrolytic iron and ferrum reductum (reduced iron) as permitted forms of iron for addition to infant foods, and to clarify the meaning of 'juice' in Standard 2.9.2 to be consistent with its meaning in Standard 2.6.1, is recommended for the following reasons:

- Electrolytic iron or ferrum reductum (reduced iron) are the most suitable forms of iron added to cereal foods, and are widely used in these products in other developed markets.
- Other permitted forms of iron affect the stability of the product and cause undesirable changes in the taste profile and colour;
- With the inadvertent omission of this permission in Volume 2 to allow the use of electrolytic iron, infant cereals may become unavailable after the end of the transition period, which may put the health of weaning infants at risk;
- The labelling of equivalent infant juice products as either juice or fruit drink because of the ambiguity of the term 'juice' in food regulation may mislead carers and negates the promotion of fair trade; and
- the impact analysis has concluded that the proposed option is cost-effective and of net benefit to infants, their carers and the food industry.

It is proposed that the draft amendment in relation to electrolytic iron comes into effect on gazettal; whereas the clarification of 'juice' comes into effect 12 months after gazettal.

1. Introduction

The purpose of this Proposal is to consider whether:

1. electrolytic iron should be reinstated as a permitted form of iron for addition to infant foods, particularly infant cereals; and
2. the meaning of the term 'juice' in the context of Standard 2.9.2 – Foods for Infants needs clarification.

The Proposal has been developed according to the simplified procedures under s.36 of the FSANZ Act as the Authority is satisfied that the Proposal raises issues of minor significance and complexity only. Under these simplified procedures the Authority has omitted to invite public comment at the Initial Assessment stage and the Initial and Draft Assessment was combined into a single report for public consultation.

In October 2002, FSANZ released the Initial / Draft Assessment Report and invited public submissions. A summary of submitter comments is at Attachment 2. This Final Assessment Report considers the issues raised in submissions and makes recommendations on draft variations to Volume 2 of the *Food Standards Code* (Attachment 1).

2. Background

2.1 Electrolytic iron

In September 2002, Heinz Wattie's Australasia drew attention to the inadvertent omission from Volume 2 of the *Food Standards Code* of electrolytic iron, or variants such as ferrum reductum (reduced iron), from the permitted forms of iron for addition to infant foods, particularly infant cereal products. Electrolytic iron is permitted in Standard R6 of Volume 1 of the *Food Standards Code*, and ferrum reductum (reduced iron) in Amendment 13 to the *New Zealand Food Regulations* 1984. Standard 2.9.2 – Foods for Infants permits the addition of certain vitamins and minerals to infant foods, however the Standard relies on the list of permitted forms given in Standard 2.9.1 – Infant Formula Products, which was gazetted in June 2002, and which does not include electrolytic iron or ferrum reductum (reduced iron) as more appropriate forms are added to infant formula products.

On 20 December 2002, Volume 2 will become the sole repository of food standards in Australia and New Zealand. Heinz Wattie's contends that, without reinstatement of the current permission for addition of electrolytic iron to infant cereals, infant cereal products would no longer comply with the *Food Standards Code* after the end of the transition period. Although stock in trade provisions would apply to stock manufactured before that date, the company argues that these products are made on a daily basis and have high turnover, and without replenishment would become unavailable within a short time. Heinz Watties is the dominant market leader (98.1% market) in Australia and such disruptions to supply would affect the entire infant cereal market and thus put at risk the health of weaning infants.

2.2 Clarification of the term ‘juice’

The two leading companies that manufacture infant juice products interpret Standard 2.9.2 differently with respect to the meaning of ‘juice’ and thus label their products as either juice or fruit drink for infants. The Standard requires that juices have no more than 4% total sugars, which in the case of fruit juice, usually requires more than a 50% dilution.

It is acknowledged that the meaning of ‘juice’ in the context of Standard 2.9.2 is ambiguous and not necessarily consistent with the definition of juice given in the commodity Standard 2.6.1 – Fruit Juice and Vegetable Juice, nor the requirement in Standard 2.6.2 – Non-Alcoholic Beverages and Brewed Soft Drinks that diluted juice products be labelled as a fruit drink.

3. Regulatory Problem

3.1 Electrolytic iron

Electrolytic iron or variants such as ferrum reductum (reduced iron) that are currently used to fortify infant cereals have been inadvertently omitted from the permitted forms of iron for addition to infant foods, particularly infant cereal products. Without timely reinstatement of that permission, infant cereal products will become noncompliant and the supply of these products, at least in Australia, could cease to exist.

3.2 Clarification of the term ‘juice’

The differing interpretations of ‘juice’ in Standard 2.9.2 and the resultant differences in the labelling of infant juice products have the potential to mislead infant carers, and to negate promotion of fair trade.

4. Objectives

In developing or varying a food standard, FSANZ is required by its legislation to meet three primary objectives which are set out in Section 10 of the *Food Standards Australia New Zealand Act 1991*. These are:

- the protection of public health and safety;
- the provision of adequate information relating to food to enable consumers to make informed choices; and
- the prevention of misleading or deceptive conduct.

In developing and varying standards, FSANZ must also have regard to:

- the need for standards to be based on risk analysis using the best available scientific evidence;
- the promotion of consistency between domestic and international food standards;
- the desirability of an efficient and internationally competitive food industry;
- the promotion of fair trading in food; and
- any written policy guidelines formulated by the Ministerial Council.

In relation to iron in infant cereals, the key objective in assessing this Proposal relates to protection of public health and safety, whereas in relation to the meaning of ‘juice’ for infants, the objectives relate to the prevention of consumer deception and promotion of fair trade.

5. Relevant Issues

5.1 Health and safety considerations in relation to electrolytic iron

Standard 2.9.2 requires a minimum iron content in infant cereal products that is achieved by the addition of iron. Electrolytic iron and ferrum reductum (reduced iron) has been permitted in Australia and New Zealand food regulation for a considerable time and are among the most suitable forms of iron for addition to infant cereal products. Other forms have deteriorating effects on product stability, taste and colour. Standard 2.9.2 relies on the permitted forms of iron listed in Standard 2.9.1 – Infant Formula Products, however this list does not include electrolytic iron or ferrum reductum (reduced iron), as more appropriate forms are added to infant formula products.

The dominant market leader currently uses electrolytic iron in its cereal products. Without reinstatement of a permission for this form of iron before the end of the transition period, infant cereals would no longer comply with the Volume 2 of *Food Standards Code*. Infant cereal products may become unavailable after that date due to high product turnover. The absence of all infant cereal products from the market could cause anxiety among carers and risk the health of weaning infants.

5.2 Consumer deception and fair trade considerations in relation to labelling of infant juice products

The two leading companies that manufacture infant juice products interpret Standard 2.9.2 differently with respect to the meaning of ‘juice’ and thus label their products as either ‘juice’ for infants or ‘fruit drink’ for infants. The Standard requires that juices have no more than 4% total sugars, which in the case of fruit juice, requires about a 50% dilution. It is acknowledged that the meaning of ‘juice’ in the context of Standard 2.9.2 is ambiguous and not necessarily consistent with the definition of juice given in the commodity Standard 2.6.1 – Fruit Juice and Vegetable Juice, which does not permit the addition of water to juices.

One of the two companies claims that its product when labelled as fruit drink is disadvantaged, presumably because carers could perceive it as an inferior product when compared to infant juice, even though the detail on most of the product range indicates equivalent or very similar products. The original intention of the Standard as shown in the Inquiry Report to Proposal P215 – Review of Foods for Infants and Young Children, was that the products should not be labelled as juice if the total sugars exceeded 4% before dilution, and that the definition of juice in Standard 2.6.1 should apply across the *Food Standards Code*. The rationale for this approach was that labelling of juice after dilution as ‘juice’ was not consistent with the generally understood meaning attributed to juice, and in doing so might mislead carers into assuming that undiluted juice was an appropriate beverage for infants.

5.3 Issues Raised in Submissions

5.3.1 Permitted forms of Iron

All submissions supported including electrolytic iron or ferrum reductum (reduced iron) as permitted forms of iron for addition to infant foods. There were no other comments on this issue.

5.3.2 Clarification of the term 'juice'

Three out of 4 submitters supported the proposed amendments to clarify the use of the word 'juice' as it relates to infants (i.e. requiring that juice diluted in accordance with the Standard 2.9.2 be referred to as 'fruit drink'). Heinz Watties Australasia, however, supported the labelling of fruit juice products formulated for infants as 'infant juice' so as to differentiate the infant product from the wide range of other fruit drinks on the market and to reduce the likelihood of carers purchasing normal juice or fruit drink for use with infants.

Assessment

As previously discussed, the original stated intention in the Inquiry Report to Proposal P215 – Review of Foods for Infants and Young Children was that *infant juices with a limited carbohydrate content would be a diluted fruit juice rather than a fruit juice that complies with the Standard for fruit juice and the label would need to indicate this*. It is therefore appropriate and consistent with Standard 2.6.2 – Non-Alcoholic Beverages and Brewed Soft Drinks for diluted fruit juices for infants to be labelled as fruit drinks and that this be clearly reflected in Standard 2.9.2 – Foods for Infants.

Given that Standard 2.9.2 requires foods for infants to be represented as such and to meet specific labelling requirements, it is expected that the label of an infant fruit drink would clearly distinguish it from other fruit drinks designed for an older market. In addition, the *Food Standards Code* does not prevent the label of an infant fruit drink from containing additional information to qualify the nature of the food. eg. fruit juice diluted with water.

5.3.3 Length of Transition Period

Golden Circle objected to the proposed 12 months transition time for the clarification of 'juice' stating that labelling on the form of packaging used for juice products are required to be changed by April 2003 to comply with the South Australian Government Container Deposit Legislation.

Assessment

A transition period of 12 months was proposed at Initial / Draft Assessment to allow manufacturers sufficient time to comply with the proposed labelling changes. As the Container Deposit Legislation only affects products sold in South Australia it is not appropriate to require manufacturers to comply with the proposed amendments before 12 months for products that are sold Australia wide.

6. Options

The following regulatory options are proposed at Final Assessment:

Option 1 – adopt the proposed draft amendments to Volume 2 of the *Food Standards Code* to include electrolytic iron and ferrum reductum (reduced iron), as permitted forms of iron for addition to infant foods especially cereals, and to clarify the meaning of ‘juice’ as it relates to infant juice products such that diluted infant juice products are not inappropriately labelled as juice.

Option 2 – reject the proposed draft amendments to Volume 2 of the *Food Standards Code*.

7. Impact Analysis

7.1 Affected parties

The parties affected by this proposal are: **consumers**, primarily weaning infants and their carers; **food industry**, in particular infant cereal and infant juice product manufacturers; and **Governments** of New Zealand, the States and Territories and the Commonwealth of Australia.

7.2 Cost benefit analysis

In order to determine the preferred regulatory option for this Proposal, FSANZ is required to assess the relative costs and benefits of each option as it impacts on the identified affected parties.

Option 1

- | | |
|----------------|---|
| Consumers: | <ul style="list-style-type: none">▪ Electrolytic iron: No direct impact as <i>status quo</i> is maintained.▪ Clarification of ‘juice’: Eliminate consumer confusion over equivalent products because of the different labelling of products either as infant ‘juice’ or fruit drink. |
| Food industry: | <ul style="list-style-type: none">▪ Electrolytic iron: Providing permission by the end of the transition period will in effect have no direct impact as <i>status quo</i> maintained.▪ Clarification of ‘juice’: Promotion of fair trade. |
| Government | <ul style="list-style-type: none">▪ No direct impact other than minor costs associated with amending the <i>Food Standards Code</i>. |

Option 2

- | | |
|------------|---|
| Consumers: | <ul style="list-style-type: none">▪ Electrolytic iron: Consumers could be denied access to infant cereal products, thus putting at risk the nutritional adequacy of weaning diets and affecting the health of weaning infants.▪ Clarification of ‘juice’: Continued consumer confusion over equivalent products and potential for carers to be misinformed about the use of undiluted juice for infants that may put some infants at risk. |
|------------|---|

- | | |
|----------------|--|
| Food industry: | <ul style="list-style-type: none"> ▪ Electrolytic iron: From 20 December 2002, infant cereal products containing electrolytic iron would no longer be manufactured thus disrupting supply. ▪ Clarification of ‘juice’: Possible market disadvantage for product labelled as fruit drink. |
| Government | <ul style="list-style-type: none"> ▪ Electrolytic iron: Increased burden on the health system from at-risk infants. ▪ Clarification of ‘juice’: Increased involvement in resolving industry dispute. |

The regulatory impact on all sectors of reinstating electrolytic iron as a permitted form of iron for addition to infant cereal products is minimal, in that the proposed measure merely serves to maintain the *status quo* in both the Australian and New Zealand markets. The regulatory impact of clarifying the meaning of ‘juice’ in relation to infant products will address potential market inequities and eliminate potential carer confusion as to the juice products suitable for infant consumption. The proposed amendment to the *Food Standards Code* given under Option 1 is therefore cost effective and of net benefit to both the food industry and consumers.

8. Consultation

8.1 Public consultation

The Authority had decided, pursuant to s.36 of the FSANZ Act, to omit to invite public submissions in relation to the proposal prior to making a draft assessment. The Authority was satisfied that the Proposal raised issues of minor significance and complexity only.

Section 63 of the Act provides that, subject to the *Administrative Appeals Tribunal Act 1975*, a person whose interests are significantly affected by the decision to omit to invite public submissions in relation to the proposal may make an application for a review of the Authority’s decision to the Administrative Appeals Tribunal.

The Initial / Draft Assessment Report for this Proposal was released for a short 2 week consultation period from 3 October 2002. The length of consultation was shortened due to the urgency in resolving the issues prior to the end of the transition period.

A total of 6 submissions were received. Details of submitters and a summary of their comments are provided at Attachment 2. All submitters supported the proposed amendments in relation to the permitted forms of iron for use in infant foods. All but one submitter supported the proposed amendment to clarify the meaning of ‘juice’ in relation to infant juice products. Issues raised in submissions are discussed in Section 5.3.2.

8.2 World Trade Organization (WTO) notification

As members of the WTO, Australia and New Zealand are signatories to the agreements on the Application of Sanitary and Phytosanitary Measures (SPS agreement) and on Technical Barriers to Trade (TBT Agreements). In some circumstances, Australia and New Zealand have an obligation to notify the WTO of changes to food standards to enable member countries of the WTO to make comment.

The proposed amendments to Volume 2 of the *Food Standards Code* are minor and do not raise any potential Sanitary/Phytosanitary matters or Technical Barriers to Trade; consequently it is not necessary to notify the WTO.

9. Conclusion and Recommendation

Adoption of the proposed amendments to Volume 2 of the *Food Standards Code* to include electrolytic iron and ferrum reductum (reduced iron), as permitted forms of iron for addition to infant foods, and to clarify the meaning of 'juice' in Standard 2.9.2 to be consistent with its meaning in Standard 2.6.1, is recommended for the following reasons:

- electrolytic iron and ferrum reductum (reduced iron) are the most suitable forms of iron added to cereal foods, and are widely used in these products in other developed markets;
- other permitted forms of iron affect the stability of the product and cause undesirable changes in the taste profile and colour;
- with the inadvertent omission of this permission in Volume 2 to allow the use of electrolytic iron, infant cereals may become unavailable after the end of the transition period, which may put the health of weaning infants at risk;
- the labelling of equivalent infant juice products as either juice or fruit drink because of the ambiguity of the term 'juice' in food regulation may mislead carers and negates the promotion of fair trade; and
- the impact analysis has concluded that the proposed option is cost-effective and of net benefit to infants, their carers and the food industry.

10. Implementation and Review

It is proposed that the draft amendment in relation to electrolytic iron comes into effect on gazettal; whereas the clarification of 'juice' comes into effect 12 months after gazettal.

11. Attachments

1. Draft variations to Volume 2 of the *Food Standards Code*.
2. Summary of submissions

ATTACHMENT 1

DRAFT VARIATIONS TO *FOOD STANDARDS CODE*

To commence: On gazettal

- [1] *Standard 2.9.2 of Volume 2 of the Food Standards Code is varied by –*
- [1.1] *omitting paragraphs 3(1)(b) and (c), substituting -*
- (b) may contain added iron in the following forms:
 - (i) electrolytic iron; or
 - (ii) reduced iron; or
 - (iii) in the permitted forms set out in Schedule 1 of Standard 2.9.1; and
 - (c) may contain added thiamin, niacin, vitamin B₆, vitamin C, folate, magnesium in the forms permitted in Schedule 1 of Standard 2.9.1; and
 - (d) may contain added vitamin C to a maximum level of 90 mg/100 g on a moisture free basis.
- [1.2] *omitting paragraph 3(2)(a), substituting -*
- (a) iron in the following forms:
 - (i) electrolytic iron; or
 - (ii) reduced iron; or
 - (iii) in the permitted forms as set out in Schedule 1 of Standard 2.9.1; and

To commence: 12 months from gazettal

- [1] *Standard 2.9.2 of Volume 2 of the Food Standards Code is varied by –*
- [1.1] *omitting paragraph 2(2)(a), substituting -*
- (a) sugars, provided in the case of a vegetable juice, fruit drink or a non-alcoholic beverage, the total sugars content of the food is no more than 4 g/100 g; and
- [1.2] *omitting the Editorial note immediately following paragraph 2(2)(a), substituting -*

Editorial note:

Standard 2.6.1 defines ‘vegetable juice’ and Standard 2.6.2 defines ‘fruit drink’ and ‘non-alcoholic beverage’.

- [1.3] *omitting paragraph 2(3)(d), substituting -*

- (d) added salt, in the case of ready-to-eat fruit-based foods, fruit drink and vegetable juice.

[1.4] *omitting from the Table to paragraph 2(3)(c), Column 1, the entry for Ready-to-eat fruit-based foods, including juices, substituting -*

Vegetable juices and ready-to-eat fruit-based foods including, fruit drinks

[1.5] *omitting paragraph 4(a), substituting -*

- (a) in the case of vegetable juices, fruit drinks and gels, must contain no less than 25 mg /100 g of vitamin C; and

[1.6] *omitting the Editorial note immediately following clause 5, substituting -*

Editorial note:

This Standard does not place limits on the use of sugars except in the case of a vegetable juice, fruit drink and non-alcoholic beverage.

Claims such as 'no added sugar', 'sweetened' or words of similar import are subject to the general labelling provisions.

ATTACHMENT 2

SUMMARY OF SUBMISSIONS

FSANZ received 6 submissions in response to public consultation on Proposal P270. A summary of submitter comments is provided below.

SUBMITTER	COMMENTS
CSIRO Health Sciences and Nutrition (Australian Commonwealth Government Agency)	<ul style="list-style-type: none"> Supports Option 1: to adopt the proposed draft amendments to Volume 2 of the <i>Food Standards Code</i> as believes that it would be detrimental to the health of infants if cereal products became unavailable and that ambiguity should be removed from labelling of fruit juice products.
Fonterra Co-operative Group Ltd (New Zealand Farmer owned Co-operative Company)	<ul style="list-style-type: none"> Supports Option 1
Golden Circle Ltd (Australian food company)	<ul style="list-style-type: none"> Supports Option 1 to amend Standard 2.9.2 to clarify the term 'juice'. Believes that consumers know and accept that these products are a fruit drink specifically designed for infants and that the use of the word 'juice' in the product description will lead to confusion of the consumer. Provides supporting documentation on the current health professional advice to dilute fruit juice for infants and the potential for carer confusion by the use of 'juice' from a Consultant Dietitian. Objects to the proposed implementation period of 12 months after gazettal for amendments to clarify the use of the term 'juice' as all product labels in this form of packaging are required to be changed by April 2003 to comply with the South Australian Government Container Deposit Legislation. Suggests that label changes can be made at the same time.
Heinz Watties Australasia (Australia/New Zealand food company)	<ul style="list-style-type: none"> Supports the proposed amendments to allow the continuation of the current permission to use electrolytic iron in infant cereals. Opposes the amendment to Standard 2.9.2 in relation to clarification of 'juice' Strongly contends that foods for infants are intended to have different compositional (including nutritional) requirements from their adult counterparts and therefore advocates that the proper name of a fruit juice product formulated for infants is 'infant juice'. Believes this is necessary to differentiate the infant product from the wide range of other fruit drinks on the market. Suggests that not having a separate name for the products it is likely that carers will purchase normal juice or fruit drink and may or may not dilute the juice before serving to an infant. Notes that in the United Kingdom and European Union, the terms 'baby juice' and 'diluted juice' are used to describe a range of infant and young persons juices that have 15% sugars limit. Supports the proposed transition period of 12 months for the proposed amendments to clarify the use of the term 'juice'
Food Technology Association of Victoria Inc	<ul style="list-style-type: none"> Supports Option 1
Public Health Services Queensland Health	<ul style="list-style-type: none"> Supports the proposed draft amendments to include electrolytic iron as a permitted form of iron.

SUBMITTER	COMMENTS
Public Health Services Queensland Health <i>Cont.</i>	<ul style="list-style-type: none"> • Strongly supports the clarification of the term ‘juice’ in relation to infant juice as considers it inconceivable that there are different types of juices • Notes that nutritionists do not advocate giving fruit juices to infants; they maintain that they must be diluted prior to being consumed by infants. • Believe that a label stating that a diluted juice beverage is a ‘juice’ is at the least confusing to consumers if not deceptive.