



Secretariat
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

30 July 2010

Dear Secretariat

CHC Submission – Nutrient Reference Values (NRV) in the Australia New Zealand Food Standards Code

Thank you for the opportunity for the complementary healthcare industry to provide comment on the potential revision to the regulatory Nutrient Reference Values (rNRVs) referenced in the Australia New Zealand Food Standards Code (the Code).

The Complementary Healthcare Council (CHC) is the leading expert association exclusively committed to a vital and sustainable healthcare products industry. The CHC is unique in representing all stakeholder groups in the complementary healthcare industry; our members include importers, exporters, raw material suppliers, manufacturers, wholesalers, distributors, retailers, practitioners, consultants, direct marketers, multi-level marketers and consumers. The CHC is the principal reference point for members, government, the media, and consumers to communicate about issues relating to the complementary healthcare industry.

The CHC supports the revision to the regulatory Nutrient Reference Values and notes the consideration for there to be consistency across both domestic and international food standards such as Codex. The CHC agrees in general with the underlying principals as outlined in the consultation paper, in particular international harmonisation with Codex where appropriate. However, the CHC recommends that the intake of complementary medicines, such as vitamin and mineral supplements, be taken into consideration during the potential revision of the rNRVs.

The CHC notes that at this stage the consultation process aims to determine the need for a revision however, the CHC stress that any implementation period that is put forward be sufficient enough (two years) to allow industry to implement any regulatory changes. Further, whilst outside the scope of this consultation, it would be in the best interests of the complementary medicine industry (through CHC) to be informed about FSANZ intentions to review specific standards, such as the meal replacement and formulated supplementary foods as they occur.

The CHC would welcome the opportunity to discuss any matters relating to this submission and if you require further information please do not hesitate to contact me.

Yours sincerely

Dr Wendy Morrow
Executive Director