FSANZ P1056 Caffeine Review

Submitted to Food Standards Australia and New Zealand (FSANZ)

Dietitians Australia support 'Option 3: Hybrid mix of regulatory and non-regulatory approaches' as outlined in the FSANZ 'P1056 first call for submissions Report' documentation.

The proposed changes to regulation should be supported by a comprehensive consumer education and awareness campaign, with key messages incorporated that explain the specific risks identified for each at-risk sub-population (including information for parents and caregivers of infants and pre-schoolers).

FSANZ should also consider the following in its proposal:

- Caffeine advisory or warning statement design and placement.
- Consistency between FSANZ and Therapeutic Good Administration Australia (TGA) on caffeine levels and advisory statement design.
- Expand advisory and warning statements applicable to children to include adolescents.
- Accuracy of product preparation instructions and requirement to provide appropriate measuring tools to promote consumption in safe amounts (for example, providing smaller scoop for powdered products, requiring energy drinks containers to be resealable if containing more than one serve).
- Requirement that international products include caffeine content on the label rather than stating "proprietary blend".
- Potential for the Trans-Tasman Mutual Recognition Act 1997 (Cth) and Trans-Tasman Mutual Recognition Arrangement (TTMRA) between Australia and New Zealand to be used as a loophole to import highly concentrated caffeine products into Australia from New Zealand, even if the products would not be allowed for import to Australia from a different country.

For more, download our full submission.

Get in touch

If you have questions about this submission, contact us at policy@dietitiansaustralia.org.au