

29 September 2014

Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143

By email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks  
(proposal P1030)**

Dear Sir/Madam

The New Zealand Medical Association (NZMA) wishes to submit on the above consultation.

The NZMA is the country's largest voluntary pan-professional medical organisation with over 5,000 members. Our members come from all disciplines within the medical profession and include general practitioners, specialists, doctors-in-training and medical students. The NZMA aims to provide leadership of the medical profession, and promote professional unity and values, and the health of New Zealanders

We note that Food Standards Australia New Zealand (FSANZ) is proposing a change to the Food Standards Code (the Code) to expand the range of claims that can be made about formulated supplementary sports foods (FSSFs), electrolyte drinks and electrolyte drink bases (EDs). While these products can already carry some claims that are specified in the Code, we understand that the proposal would allow these products to carry a broader range of health claims related to their purpose and composition.

Research has demonstrated a “striking lack of evidence” to support the vast majority of sports-related products that make claims related to enhanced performance or recovery, including drinks and supplements.<sup>1</sup> The NZMA takes the view that health claims should not

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<sup>1</sup> Heneghan C, et al. The evidence underpinning sports performance products: a systematic assessment. *BMJ Open* 2012;2:e001702 doi:10.1136/bmjopen-2012-001702

be used to promote so-called 'sports drinks' that are frequently high in sugar and are acidic, and contribute to major public health issues including obesity and dental caries.

We are concerned that instead of strengthening regulation of health claims by such products, FSANZ is proposing a change that could lead to even greater inappropriate use of these products, especially by young people. New Zealand research has found that children are already faced with mixed messages about what food and nutrition is required for sport.<sup>2</sup>

Accordingly, the NZMA does not support the proposed variation to the Code to permit FSSFs and EDs to carry self-substantiated health claims. Rather, we submit that the regulator require appropriate labelling and warning statements for these products as part of a suite of measures to improve health literacy and the broader food environment. In this regard, we draw attention to the NZMA Policy Briefing 'Tackling Obesity'<sup>3</sup> which outlines a number of measures including improved food labelling to address this major public health issue.

We hope that our feedback on this consultation has been helpful and look forward to learning the outcome of this proposal.

Yours sincerely



Dr Mark Peterson  
NZMA Chair

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<sup>2</sup> Smith, M, et al. Consuming calories and creating cavities: beverages NZ children associate with sport. *Appetite* 2014; Volume 81, 1 October 2014, Pages 209-217

<sup>3</sup> NZMA. Tackling Obesity: policy briefing. May 2014. Available from <http://www.nzma.org.nz/publications/tackling-obesity>