



February 2008

**Submission from the Dietitians Association of Australia
A597 Addition of lutein to FSFYC**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 3400 members, and branches in each State and Territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

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DAA appreciates the opportunity to comment on the Application A597 Addition of lutein as an optional nutritive substance in formulated supplementary foods for young children (FSFYC).

DAA supports Option 2 – amend Standard 2.9.3 Division 4 to permit the voluntary addition of lutein as a nutritive substance at a maximum concentration of 100µg/serve in FSFYC and to require a minimum declaration of 30 µg/serve when a nutrition claim is made.

This support is given on the evidence that lutein is not harmful in the amounts outlined in the proposal. Lutein is considered safe for use in small amounts in medicines in Australia, and the hazard assessment concludes that lutein is a normal constituent of the human diet, is well tolerated and is unlikely to exert adverse effects within the wide range of normal consumption from their natural sources. Furthermore, the range of products which would be affected by implementing this Option would be small, and the amount of lutein consumed in a recommended serving size would be small, thus limiting the risk to young children.

DAA does have reservations however about the small amount of evidence showing benefit for the addition of lutein. DAA expects that any claims which are made about the product will need to be substantiated in the usual way.

Also, DAA does not agree with the statement (page 3) that some of the richest food sources of lutein are often the least preferred foods of toddlers and young children. This would seem a spurious suggestion, as various foods rich in lutein are in fact commonly consumed by young children, even if they do not consistently eat one

food. This suggestion sets up false expectations for parents who may take food refusal on one occasion as permanent dislike and therefore rely on a supplemental food for their child rather than continuing to offer a range of commonly available lutein-rich foods.

DAA agrees that a minimum claimable amount be established for lutein, and possibly for other future nutrition substances, in FSFYC, noting the current and proposed regulations for nutrition and health claims.