



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

10 October 2002

S02.41

**Submission to the New Zealand Food Safety Authority on
Policy guidelines for the regulation of caffeine in food**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 national organised societies. It has 34 branches spread throughout the country to which women from some 150 societies are affiliated. Its purpose is to work for the well being of women, families and society through research, discussion and action.

As the document was only received by NCWNZ on 26 September, we have not been able to consult widely with our membership on this document. If documents are to be despatched from Australia, then a minimum of three weeks needs to be added to the consultation time to allow for delivery of the document.

NCWNZ has made a number of submissions on additives to food and drink, including one on caffeine in non-alcoholic beverages, and this response is based on these previous submissions.

We wish to re-iterate our concerns from these submissions:

- There should be a statement on the label clearly identifying the quantity of caffeine added to the product.
- The addition of caffeine is a concern for a portion of the population, who for varying reasons (including medical ones), do not wish to have extra caffeine in their diet
- Addition of caffeine to products may limit the choice of some consumers in the range of products that they can consume

NCWNZ concurs with the High Order Principles and Specific Principles as outlined on p. 7 of the document, particularly the first one 'to ensure that vulnerable subgroups of the population, such as children, pregnant women or people sensitive to caffeine, are not adversely affected by added caffeine in food'.

In general NCWNZ does not support the broadening of permissions for caffeine to be added to food or drink. Therefore we would favour Policy Option 2 'No extension to the permissions for the use of caffeine as an additive to food' with Policy Option 5 'Restrictions to current permissions for adding guarana and other caffeine-containing substances classed as food to other foods'.

We thank you for the opportunity to comment on this document, and hope you are able to take our comments into consideration.

Beryl Anderson
National President

Eileen Imlach
Consumer Affairs Standing Committee

