



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to the Australia New Zealand Food Authority on
Application A410: Phytosterol Esters as Novel Food Ingredients**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 nationally organised societies. It has 35 branches spread throughout the country to which women from some 150 societies are affiliated.

The Consumer Affairs committee of NCWNZ thank ANZFA for forwarding their discussion papers on Application A410 – Phytosterol Esters as Novel Food Ingredients.

Your papers state in paragraph 2 “Background” page 1 that “Phytosterol esters are currently being added (to a total of 13.7%) to two brands of table spread in Australia. It is claimed by the manufacturers that **incorporation of additional phytosterol esters into the diet may be an effective way of lowering total and LDL cholesterol levels.** The naturally occurring level of phytosterols in table spreads is 0.3 – 0.4%.”

NCWNZ believe this is a health claim which must be clearly substantiated with positive proof and must not be used as a marketing strategy.

We note in the Regulatory Impact Assessment, page 2 para 1 you state “The regulatory impact assessment is preliminary only and based on available information and on **information provided by the applicant.**”

NCWNZ believe that **independent assessment** of the information provided by the applicant is essential.

Until the results of a full assessment of the application are available NCWNZ would prefer Option 1 which states “Not approve the use of phytosterol esters as novel foods.” We require proof of the health claim which states that phytosterol esters may lower blood cholesterol.

Barbara Glenie
National President

Marie Taylor
Convener, Consumer Affairs Standing Committee

