



Guidance Document

Supplemented Food Standard User Guide

Draft

Title

Guidance Document: Supplemented Food Standard User Guide

About this document

The New Zealand Food (Supplemented Food) Standard (SFS) became effective on 1 March 2016 and is a New Zealand only standard.

This User Guide aims to assist manufacturers, importers, exporters, retailers and consultants in interpreting and applying the requirements of the SFS.

The SFS contains one part:

- a) Part 1, which outlines composition and labelling requirements for supplemented foods..

Related Requirements

New Zealand Food (Supplemented Food) Standard 2016

Document history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description
January 2014	March 2016	All	To reflect administrative changes to the New Zealand Food (Supplemented Food) Standard 2016 and Australia New Zealand Food Standard Code references

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1 Purpose

- (1) This version of the Supplemented Food Standard User Guide updates the previous iterations; namely Version 3 (January 2014) of the Supplemented Food Standard User Guide.
- (2) This guidance provides clarity for applying the New Zealand Food (Supplemented Food) Standard 2016 (SFS) to your product, including the references to the revised version of the Australia New Zealand Food Standards Code (the Food Standards Code) which came into effect on 1 March 2016.
- (3) If you are in any doubt about the requirements of the SFS and how they apply, MPI recommends that you seek independent legal advice.
- (4) Supplemented food for sale in New Zealand must also comply with any other relevant legislation, including, but not limited to, the Food Act 2014¹, the Animal Products Act 1999, and the Fair Trading Act 1986.

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¹ The Food Act 2014 came into force on 1 March 2016 with a three year introductory period for existing businesses. During the introductory period, businesses operating under the Food Hygiene Regulations 1974 will need to register to operate under the Food Act 2014. See www.mpi.govt.nz for more information about this.

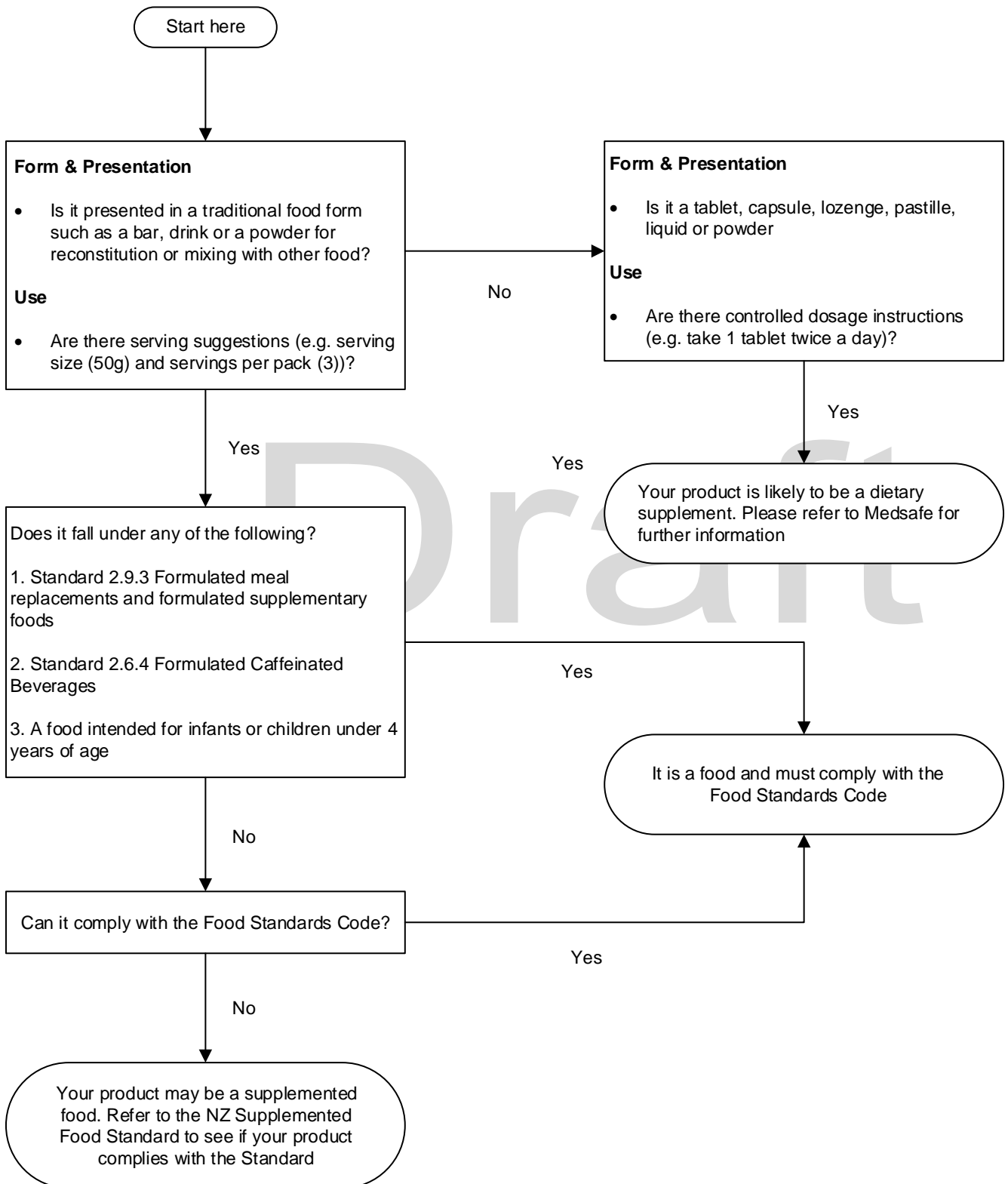
2 Background

- (1) Most food sold in New Zealand is regulated under the Australia New Zealand Food Standards Code (the Food Standards Code) which is a set of common food standards shared by New Zealand and Australia.
- (2) Prior to 31 March 2010, some food products were sold as dietary supplements under the Dietary Supplements Regulations 1985. These foods were commonly known as food-type dietary supplements.
- (3) When Australia and New Zealand agreed to the development of a joint food standards system it was agreed that the Dietary Supplements Regulations 1985 would be retained until appropriate permissions became available in the Food Standards Code. These permissions have not yet been developed but discussions are on-going between New Zealand and Australia.
- (4) The SFS, introduced in March 2010, was developed to provide updated regulation for food-type dietary supplements and to align them as closely as possible with requirements in the Food Standards Code. The amendment to the SFS in November 2013 incorporates by reference the new Standard 1.2.7 – Nutrition, Health and Related Claims of the Food Standards Code (which allows supplemented foods to make health claims in accordance with Standard 1.2.7) and clarifies how the SFS applies to caffeine and other minor matters. This amendment in February 2016 was administrative in nature to incorporate references to the revised version of the Food Standards Code which came into effect on 1 March 2016 and to change the formatting of the standard to be consistent with other standards issued under the Food Act 2014.
- (5) Foods regulated under the SFS, are known as "supplemented foods". The SFS provides for the regulation of supplemented foods in New Zealand until these products can be accommodated under the Food Standards Code in the future. The SFS applies in New Zealand only and is not a joint standard with Australia.
- (6) Proposals for the SFS were the subject of consultation in 200, 2008, 2013 and 2015. Refer to Appendix 1 for the objectives included in the scope of developing the SFS.

3 Definitions

- (1) A supplemented food is:
 - a) “A product that is represented as a food that has a substance or substances added to it or that has been modified in some way to perform a physiological role beyond the provision of a simple nutritive requirement.” [SFS subclause 1.3(1)]
- (2) Since the definition of supplemented food is broad, the SFS makes it clear that several types of products are not supplemented foods. The SFS notes that this list of products is not exhaustive. These include:
 - a) Dietary supplements (as defined in the Dietary Supplements Regulations 1985); medicines (as defined in the Medicines Act 1981).
 - b) Controlled drugs or restricted substances (as defined in the Misuse of Drugs Act 1975).
 - c) Formulated meal replacements or formulated supplementary foods (as defined in section 1.1.2—3 of the Food Standards Code).
 - d) Formulated caffeinated beverages (as defined in section 1.1.2—6 of the Food Standards Code).
- (3) The SFS also specifies that supplemented foods must not be specifically formulated for use by infants or young children under the age of four years [SFS clause 1.5].
- (4) If a food meets the appropriate permissions for a particular type of product as defined in the Food Standards Code, it cannot be sold as a supplemented food. Where there are not appropriate permissions in the Food Standards Code, it is possible that the food may meet the SFS requirements.
- (5) Examples of how the SFS may be applied are provided below:
 - a) A milk or yoghurt product with added folic acid could be considered a supplemented food. The Food Standards Code does not permit the addition of folic acid to milk or yoghurt, whereas the Supplemented Food Standard does (at restricted levels).
 - b) A caffeinated beverage with a level of caffeine that is higher than the level of caffeine permitted in Standard 2.6.4 of the Food Standards Code for a formulated caffeinated beverage would not be considered a supplemented food. The Standard makes it clear that several types of products, including formulated caffeinated beverages are not supplemented foods. Instead it would be considered non-compliant with Standard 2.6.4 and require reformulation to comply with Standard 2.6.4.

4 Flowchart to determine which requirements apply to your Product



5 How does the Food Standards Code relate to Supplemented Food?

- (1) The SFS requires supplemented foods to comply with the majority of standards in the Food Standards Code. This will ensure that supplemented foods are aligned as closely as possible with food regulated by the Food Standards Code, especially in relation to labelling, contaminants, food additives, processing aids, and prohibited and restricted plants and fungi.
- (2) This close alignment will make it easier for supplemented foods to transition into regulation under the Food Standards Code once appropriate permissions are available in the future.
- (3) Table 1 in the SFS lists the parts of the Food Standards Code that do not apply or apply as modified. Clause 1.4 of the SFS clarifies the application of the Food Standards Code to supplemented foods. In general, unless otherwise specified, the parts of the Food Standards Code that ordinarily apply in New Zealand apply to supplemented food.

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6 What can and cannot be added to Supplemented Food?

- (1) There are a range of substances such as vitamins, minerals, food additives and processing aids that can be added to supplemented foods at certain levels. There are also clear prohibitions on intoxicating substances and particular plants and fungi.
- (2) There is an overarching requirement of the Food Act 2014, that all additions to supplemented foods result in food that is safe and suitable.
- (3) A summary of the categories of substances that can and cannot be added to supplemented food is provided below.

6.1 Vitamins, Minerals, Botanical and Bio-active Substances

- (1) The SFS does not provide a complete list of vitamins, minerals, botanical and bio-active substances that can be added to supplemented foods. Unless it is specifically restricted or prohibited in the SFS any vitamin, mineral, botanical or bioactive substance may be added to a supplemented food if it is safe and suitable for the purpose that it is being added.
- (2) Botanicals and bioactive ingredients could include herbal extracts, pre-and pro-biotics, glucosamine, soy isoflavones, polyphenols, antioxidants, amino acids, creatinine, and coenzyme Q10.
- (3) Any of the vitamins and minerals and their permitted forms, as listed in sections S17—2 and S17—3 of the Food Standards Code, can be added to supplemented foods. Some vitamins and minerals have restrictions on the amount that can be added to supplemented food (i.e. the maximum per one day quantity). These are listed in Clause 1.12, Table 4 of the SFS. If the total amount (including the naturally occurring amount) of the vitamin or mineral being added exceeds the level specified in Column 3 of Table 4 of the SFS, an advisory statement must be included on the label to the effect that the product is intended for consumption only by persons of or over the age of 14 years.
- (4) For the other vitamins and minerals that have no specified upper level but may be added to supplemented foods, there is an expectation that they will only be added at a level that is safe and suitable for the purpose for which they are being added.
- (5) A full list of all the permitted vitamins and minerals, their permitted forms and any maximum one day quantity restrictions are in Appendix 2 of this User Guide.

6.2 Food Additives and Processing Aids

- (1) Standard 1.3.1 Food Additives and Standard 1.3.3 Processing Aids in the Food Standards Code also apply to supplemented foods.
- (2) Food additives include acidity regulators, antioxidants, bulking agents, colours, emulsifiers, firming agents, flavourings, foaming agents, gelling agents, humectants, intense sweeteners, preservatives, raising agents, stabilisers and thickeners. These functions are all defined in Schedule 14 Technological purposes performed by substances used as food additives.
- (3) Any restrictions on the use of food additives as detailed in Schedule 15 Substances that may be used as food additives or processing aids as detailed in Schedule 18 Processing aids also apply to their use in supplemented foods.
- (4) Clause 1.9 of the SFS clarifies that a supplemented food may contain caffeine for a purpose other than as a food additive.

6.3 Intoxicating Substances

- (1) Clause 1.7 of the SFS prohibits the use of any substance in supplemented foods that is intended to have an intoxicating effect on any person who consumes it. Examples of intoxicating substances included are alcohol and herbal highs.

6.4 Prohibited and Restricted Plants and Fungi

- (1) Standard 1.4.4 Prohibited and Restricted Plants and Fungi of the Food Standards Code also applies to supplemented foods, with the exception St John's Wort (*Hypericum perforatum*). Clause 10 of the SFS permits the use of St John's Wort in supplemented foods that are herbal infusions, provided the label on the supplemented food contains a warning related to the presence of St John's Wort in the product.
- (2) Clause 1.11 of the SFS also prohibits the addition of:
 - a) Black cohosh (*Actaea/Cimicifuga racemosa*).
 - b) Kava (*Piper methysticum*).
- (3) If there is further evidence that raises safety issues about other substances it is intended that this evidence would be considered and if appropriate the SFS amended to restrict or prohibit the concerned substances.

6.5 Prohibited Substances in Supplemented Foods Under the Medicines Act 1981

- (1) Substances that are classified as medicines under the Medicines Act 1981 cannot be added to supplemented foods. Check the Medsafe website (www.medsafe.govt.nz) to see if a substance is a classified medicine.
- (2) It is important to note that some substances contain active components that are classified as medicines. For example, *citrus aurantium* (bitter orange extract) is a herbal "medicine" that contains oxedrine. Oxedrine is a prescription medicine if it is present at more than 30mg per recommended daily dose. Therefore *Citrus aurantium* cannot be added to a supplemented food if oxedrine is present above this level.

6.6 Novel Foods

- (1) A food that is considered novel may be used in supplemented food as long as it can meet the safe and suitable provisions in the Food Act 2014.

6.7 Other

- (1) Supplemented food can contain added caffeine for a purpose other than as a food additive (for example, as an ingredient). That is, caffeine can be added at levels that are above the amounts currently permitted as a food additive (145 milligrams per litre). Products that meet the definition of "formulated caffeinated beverage" in the Food Standards Code will remain excluded from the scope of the SFS.

7 Labelling of Supplemented Foods

7.1 Introduction

- (1) The labelling requirements for supplemented foods are similar to those in the Food Standards Code.
- (2) All standards in Part 1.2 Labelling and Other Information Requirements of the Food Standards Code apply to supplemented foods, with the exception of Standard 1.2.2 Information requirements – food identification. This is because in Clause 1.6 of the SFS there are identification details that apply to supplemented foods only. The identification requirements that apply to supplemented food and must be shown on the label are:
 - a) The words “supplemented food” (note this must be placed in a prominent position on the label).
 - b) The name or a description of the food sufficient to indicate the true nature of the food (for example, strawberry flavoured yoghurt with vitamin D).
 - c) The lot identification, unless the supplemented food is in a small package².
 - d) The name and business address in New Zealand of the supplier of the supplemented food.
- (3) Other general labelling requirements that apply to all foods sold under the Food Standards Code also apply to supplemented foods. These include:
 - a) Mandatory warning and advisory statements and declarations (for example, allergen declarations – see Standard 1.2.3).
 - b) Labelling of ingredients (for example, full ingredient lists, in order of in-going weight – see Standard 1.2.4).
 - c) Nutrition information requirements (e.g. nutrition information panels - see Standard 1.2.8).
 - d) Date marking (for example, best before and use by dates – see Standard 1.2.5).
 - e) Directions for use and storage of food (see Standard 1.2.6); legibility requirements (for example, labels must be written in English – see sections 1.2.1—24 and 1.2.1—25).
 - f) Nutrition, health and related claims (see Standard 1.2.7, and also section 7.3 in this User Guide)
 - g) Characterising ingredients (for example, the declaration of characterising ingredients – see Standard 1.2.10).
- (4) For more detailed information on general labelling requirements refer to MPI's web pages on labelling and composition www.foodsafety.govt.nz/industry/general/labelling-composition/.

7.2 Safety Labelling

7.2.1 Appropriate Daily Amounts

- (1) Supplemented foods may contain higher levels of some substances. If there is a potential risk to a person in consuming more than an appropriate daily quantity of a supplemented food, the label on the package of the supplemented food must specify an appropriate daily consumption. An advisory statement to the effect that exceeding that daily consumption may cause harm must also be included.
- (2) An “appropriate daily consumption” for a supplemented food should be established by the manufacturer based on sound scientific evidence. MPI is able to take enforcement action under the general provisions of the Food Act 2014 where there is evidence that consumers of a supplemented food are at risk.

² Small package means a package with a surface area of less than 100 cm². For guidance on calculating surface area see page 35 of the labelling guide appendix
<http://www.foodsafety.govt.nz/elibrary/industry/nzfsa-food-labelling-guide/index.htm>

7.2.2 Warning Statements

- (1) Warning statements must be written in the text prescribed in the Food Standards Code or the SFS and be in a type size of not less than 3mm except in the case of a small package where the type size must not be less than 1.5mm.
- (2) In addition to the mandatory warning statements listed in Standard 1.2.3 of the Food Standards Code, the SFS requires a warning statement on the label for products that contain St John's Wort or vitamin K.
- (3) St John's Wort (*Hypericum perforatum*) can interact with some prescription medicines and can only be used in supplemented foods that are herbal infusions (tea). If used in a supplemented food product, the label on the package must contain the following warning statement: "If you take prescription medicines consult your doctor before using this product. Do not take if pregnant."
- (4) Vitamin K can interact with some prescription medicines. If a supplemented food contains vitamin K, the label must bear the following warning statement: "Contains vitamin K. People taking warfarin should seek medical advice before starting consumption".

7.2.3 Advisory Statements

- (1) Where an advisory statement is required the label must include the advisory statement listed in relation to that food in the SFS or Standard 1.2.3 of the Food Standards Code. Caffeine and guarana are two examples where advisory statements are required.
- (2) If a supplemented food contains a level of caffeine that is greater than a level required for a technological function under conditions of good manufacturing practice (for example, flavouring in kola type beverages), the label on the package of food must include:
 - a) An advisory statement to the effect that the food contains caffeine, and is not recommended for children, pregnant or lactating women, or individuals sensitive to caffeine
 - b) And
- (3) The following details in the nutrition information panel either adjacent to or below the nutrition information required by Standard 1.2.8 of the Food Standards Code:
 - a) The average quantity of caffeine per serve.
 - b) The average quantity of caffeine per 100ml or 100g.
- (4) Guarana contains caffeine. If a supplemented food contains guarana, the label must bear an advisory statement to the effect that food contains caffeine.

7.3 Claims

- (1) Standard 1.2.7 of the Food Standards Code regulates the voluntary use of nutrition content claims, health claims and endorsements. The Standard enables industry to make claims on food and provides consumers with scientifically based information that can assist in informed decision making.

7.3.1 Therapeutic Claims

- (1) Section 1.2.7—8 prohibits the use of therapeutic claims. A claim must not refer to the prevention, diagnosis, cure or alleviation of a disease, disorder or condition. A claim that compares a food with a good that is represented to be for therapeutic use, or is likely to be taken to be for therapeutic use, is also not permitted.

7.3.2 Nutrition Content Claims and Health Claims

- (1) A "nutrition content claim" is a claim about the presence or absence of energy, a nutrient or a biologically active substance in food. Examples include, "low in fat" or "good source of calcium". In

order to make such claims, certain conditions apply. For example, a food that is described as “low fat” must contain no more fat than 3 grams per 100 grams for solid food.

- (2) A ‘health claim’ is a claim that a food or a property of food has or may have a health effect. There are two types of health claims:
 - a) “High level health claims” refer to the presence of a nutrient or substance in a food and its relationship to a serious disease or a biomarker of a disease (for example, “diets high in calcium reduce the risk of osteoporosis in persons 65 years and over”). All high level health claims must be based on food health relationship pre-approved by Food Standards Australia New Zealand (FSANZ). Section S4—4 Conditions for permitted high level health claims lists the pre-approved food-health relationships for high level claims.
 - b) “General level health claims” refer to the presence of a nutrient or substance in a food and its relationship to a health or physiological function (for example, “calcium is good for healthy bones and teeth”). Food businesses wishing to make general level health claims can base their claims on either:
 - i) Food–health relationships that have been pre-approved by FSANZ and listed in section S4—5 Conditions for permitted general level health claims
 - Or
 - ii) A self - substantiated claim based on a notified food-health relationship that has been established by a process of systematic review that is described in Schedule 6 Required elements of a systematic review
- (3) All health claims are required to be supported by scientific evidence and are only permitted on supplemented foods that meet specific eligibility criteria, including the nutrient profiling scoring criteria (NPSC). The NPSC restricts the use of health claims on products considered to be of “lower nutritional quality”. For example, health claims will not be allowed on foods too high in saturated fat, sugar or salt. Standard 1.2.7 aims to ensure that consumers can have confidence that health claims are scientifically based.
- (4) For example, in the case of making a general level health claim on yoghurt that contains folic acid, consideration to the following should be given:
 - a) Does the product meet the NPSC?
 - b) What percentage of the NRV is needed and which NRV should be used?
 - c) What are the general conditions that need to be met?
 - d) If making a general level claim, what types of claims can be made?

7.3.3 Notification Process

- (1) If you want to make a general level health claim based on a food-health relationship that is not in section S4—5 there is an option to make a self-substantiated claim.
- (2) This requires a person to notify MPI of a relationship between a food or property of food and a health effect (food-health relationship) which has been established by a process of systematic review. That is described in Schedule 6 . Notification must be made before making a general level health claim based on the food-health relationship. This requirement is set out in sections 1.2.7—18 and 1.2.7—19. The requirement to notify MPI using these clauses is covered under Clause 1.4 of the SFS.
- (3) The person responsible for making the general level health claim is required to:
 - a) Notify the Director General of MPI of the details of an established food-health relationship and provide the name and address of the person making the notification.
 - b) Certify that the food-health relationship has been established by a process of systematic review as described in Schedule 6
 - c) Consent for the information provided above to be made available on the MPI website* (www.foodsafety.govt.nz).
 - d) Agree to be responsible for ensuring the information on the MPI website is current and correct, and agree to notify MPI promptly should any information change.

* Note that the information may not necessarily be published on the MPI website.

- (4) Paragraph 1.2.7—19(1)(d) requires that if requested you will need to provide records that demonstrate that the systematic review was conducted in accordance with Schedule 6 and that the notified relationship is a reasonable conclusion of the systematic review.
- (5) If you want to make a general level health claim based on a food-health relationship that is already on the list of notified food-health relationships, you must also notify MPI of the relationship and certify that the food-health relationship has been established by a process of systematic review as described in Schedule 6.
- (6) **How do I Notify MPI?**
 - a) Complete Notification Form FA5, Established relationship between a supplemented food/property of supplemented food and a health effect www.foodsafety.govt.nz/industry/general/labelling-composition/applying-requirements/supplemented.htm and email it to approvals@mpi.govt.nz.
 - b) You will need to provide details such as (refer to FA5 for further information):
 - i) Name and address of the person making the notification.
 - ii) Details of the food-health relationship established between a food or property of food and a health effect
And
 - iii) A copy of the certificate that states that the food-health relationship has been established by a process of systematic review as described in Schedule 6 of the Food Standards Code.
- (7) **What Happens after I have Notified MPI?**
 - a) Receipt of your notification and attached certificate will be acknowledged via reply email.
 - b) You will receive an email when your notification information has been added to the list.
 - c) Following the initial notification, if there are any changes to the information provided, you should notify MPI of the changes.
 - d) If you update a systematic review of a relationship between a food or property of food and health effect that you have previously notified to MPI and the conclusion is consistent with the previous review, you do not need to notify MPI again.
 - e) However, if the conclusion no longer meets the requirements of Standard 1.2.7 you should ask MPI to remove the notified food-health relationship from the list.

7.4 Nutritional Information Panel

- (1) All supplemented foods are required to comply with Standard 1.2.8 Nutrition information requirements of the Food Standards Code. This standard describes the information and requirements for nutrition information on food labels including the prescribed format for declaring nutrients in the nutrition information panel.

7.5 Nutrient Reference Values (NRVs)

- (1) When the SFS was developed, the 2006 National Health and Medical Research Council Australia New Zealand Nutrient Reference Values (NRVs) were adopted. The 2006 NRVs provided the most up to date published Recommended Dietary Intakes (RDIs) and Adequate Intakes (AIs) for certain nutrients for specific population sub-groups in Australia and New Zealand at the time. Where a product is intended for the general population, the mean RDI or AI for adult men and women should be used for determining a vitamin or mineral content claim.

8 Further Information

- (1) MPI can provide information to interested parties on the SFS. However, MPI cannot provide regulatory pre-approval of labels or the composition of a product, or legal advice on interpretation of the SFS.
- (2) It is the responsibility of the suppliers of supplemented food to ensure compliance with the relevant food regulatory requirements. If you are developing a supplemented food product, you may wish to engage a qualified consultant or independent legal counsel for further advice.

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Appendix 1: Objectives Included in Scope of Developing the Supplemented Food Standard

- (1) The objectives of the Supplemented Food Standard are to provide adequate regulatory coverage for supplemented food in order to:
 - a) Protect public health and safety while maintaining consumer choice.
 - b) Support economic growth.
 - c) Maintain an existing ability for New Zealand consumers, manufacturers, importers and exporters to access and supply these products.
 - d) Align the regulatory requirements for supplemented foods with those that apply to foods generally under the Food Standards Code, to the maximum extent possible.
 - e) Facilitate the transfer of supplemented food to regulation under the Food Standards Code when appropriate permissions are developed.
 - f) Prevent the addition of intoxicating substances, such as alcohol or herbal highs, to supplemented food.

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Appendix 2: Vitamins and Minerals: Permitted Forms and Maximum Quantities

- (1) This table combines the vitamins and minerals and their permitted forms from sections S17—2 and S17—3 of the [Food Standards Code](#) with any associated maximum permitted quantities as specified in Clause 15 of the [Supplemented Food Standard](#). No maximum quantity applies if one is not specified in this table. Please refer to these standards for up to date information.

Vitamin or mineral	Permitted forms	Maximum per one day quantity	Maximum per one day quantity above which an advisory statement is required
Vitamins			
Retinol (Vitamin A)	<i>Retinol Forms</i> Vitamin A (retinol) Vitamin A acetate (retinyl acetate) Vitamin A palmitate (retinyl palmitate) Vitamin A propionate (retinyl propionate) <i>Carotenoid/Provitamin A Forms</i> beta-apo-8'-carotenal beta -carotene-synthetic carotenes-natural beta -apo-8'-carotenoic acid ethyl ester	1500 mcg	450 mcg
Thiamin (Vitamin B1)	Thiamin hydrochloride Thiamin mononitrate Thiamin monophosphate		
Riboflavin (Vitamin B2)	Riboflavin Riboflavin 5'-phosphate sodium		
Niacin (Vitamin B3)	Niacinamide (Nicotinamide) Nicotinic acid	450 mg 17.5 mg	125 mg 7.5 mg
Folic acid (Folate)	Folic acid L-methyltetrahydrofolate, calcium	500 mcg	200 mcg

Pyridoxine (Vitamin B6)	Pyridoxine hydrochloride	25 mg	10 mg
Vitamin B12	Cyancobalamin Hydroxocobalamin		
Biotin	No permitted form specified		
Pantothenic acid	Calcium pantotate Dexpantenol		
Vitamin C	L-ascorbic acid Ascorbyl palmitate Calcium ascorbate Potassium ascorbate Sodium ascorbate	500 mg	500 mg
Vitamin D	Vitamin D2 (ergocalciferol) Vitamin D3 (cholecalciferol)	40 mcg	40 mcg
Vitamin E (as alpha-tocopherol equivalents)	dl-alpha-tocopherol d- alpha -tocopherol concentrate Tocopherols concentrate, mixed d- alpha -tocopheryl acetate dl- alpha -tocopheryl acetate d- alpha -tocopheryl acetate concentrate d- alpha -tocopheryl acid succinate	150 mg	50 mg
Vitamin K	No permitted form specified		
Choline		1750mg	500 mg
Minerals			
Calcium	Calcium carbonate Calcium chloride Calcium chloride, anhydrous Calcium chloride solution Calcium citrate Calcium gluconate Calcium	1250 mg	1250 mg

	glycerophosphate Calcium lactate Calcium oxide Calcium phosphate, dibasic Calcium phosphate, monobasic Calcium phosphate, tribasic Calcium sodium lactate Calcium sulphate		
Chromium	No permitted form specified		
Copper	No permitted form specified	5 mg	1.5 mg
Fluoride		5 mg	1.1 mg
Iodine	Potassium iodate Potassium iodide Sodium iodate Sodium iodide	300 mcg	150 mcg
Iron	Ferric ammonium citrate, brown or green Ferric ammonium phosphate Ferric citrate Ferric hydroxide Ferric phosphate Ferric pyrophosphate Ferric sodium edetate Ferric sulphate (iron III sulphate) Ferrous carbonate Ferrous citrate Ferrous fumarate Ferrous gluconate Ferrous lactate Ferrous succinate Ferrous sulphate (iron II	22.5 mg	20 mg

	<p>sulphate)</p> <p>Ferrous sulphate, dried</p> <p>Iron, reduced (ferrum reductum)</p>		
Magnesium	<p>Magnesium carbonate</p> <p>Magnesium chloride</p> <p>Magnesium gluconate</p> <p>Magnesium oxide</p> <p>Magnesium phosphate, dibasic</p> <p>Magnesium phosphate, Tribasic</p> <p>nesium sulphate</p>	175 mg	55 mg
Manganese	No permitted form specified		
Molybdenum	No permitted form specified	1000 mcg	300 mcg
Phosphorous	<p>Calcium phosphate, dibasic</p> <p>Calcium phosphate, monobasic</p> <p>Calcium phosphate, tribasic</p> <p>Bone phosphate</p> <p>Magnesium phosphate, dibasic</p> <p>Magnesium phosphate, tribasic</p> <p>Calcium glycerophosphate</p> <p>Potassium glycerophosphate</p> <p>Phosphoric acid</p> <p>Potassium phosphate, dibasic</p> <p>Potassium phosphate, monobasic</p> <p>Sodium phosphate,</p>	2000 mg	1500 mg

	dibasic		
Selenium	Seleno methionine Sodium selenate Sodium selenite	150 mcg	75 mcg
Sodium		1150 mg	700 mg
Zinc	Zinc acetate Zinc chloride Zinc gluconate Zinc lactate Zinc oxide Zinc sulphate	20 mg	6 mg

Draft