

FSANZ

**2nd Call for submissions –
Proposal P1056 Caffeine review**

15 April 2025



The George Institute
for Global Health

Acknowledgement of Country

The George Institute acknowledges the traditional owners of the lands on which we work, and in particular the Gadigal people of the Eora Nation on which our Sydney office is situated.

We pay our respects to Elders past, present and future. We value and respect the ongoing connection of Aboriginal and Torres Strait Islander peoples to Country and are committed to working in partnership with communities to deliver better health outcomes.

About The George Institute for Global Health

At The George Institute, we believe everyone has the right to a healthy life. We are a research organisation that finds solutions to some of the world's biggest health challenges.

With major centres in Australia, the UK, China, and India, and over 245 active projects in more than 50 countries, we work with partners and communities across the world to conduct rigorous, high-quality research to make a real difference to people's health, particularly those facing the most barriers.

From pioneering clinical trials to transformative digital health innovations, translating evidence into scalable solutions, shaping health policies and advocating for change, we're focused on a future where health equity is a reality, not just an aspiration.

At the heart of our mission to improve the health of millions worldwide is a belief in the power of change. Together, we're building a healthier, more just world.

Key contacts

Veronica Le Nevez

Head of Impact and Engagement

The George Institute for Global Health

vlenevez@georgeinstitute.org.au

Damian Maganja

Research Fellow, Food Policy

The George Institute for Global Health

dmaganja@georgeinstitute.org.au

The George Institute welcomes the opportunity to respond to the Food Standards Australia and New Zealand's (FSANZ) P1056 Caffeine Review. Given that this is the second call for submissions, this response outlines areas of support. The George Institute emphasises the need for an updated National Nutrition Survey and highlights strong support for comprehensive, regularly updated, independently collected data on the composition of foods currently available in the Australian market to support this work. The George Institute houses the FoodSwitch dataset which collects such information for approx. 25k products annually. This kind of data can facilitate useful analysis of the current proposal,¹ and can also be used to support monitoring and enforcement of any finalised regulation.

The George Institute supports the following FSANZ responses:

- caffeine should be limited to less than 200mg/day
- inclusion of an express prohibition on the retail sale of caffeine as a food
- inclusion of an express prohibition on the addition of caffeine as an ingredient or component, to foods for retail sale, other than those that have a specific permission
- setting a maximum 200 mg one-day quantity of caffeine for Formulated supplementary sports foods (FSSF) in conjunction with labelling requirements is consistent with the specific policy principles
- retaining the 5% maximum limit for FSSFs that are powders
- requiring individual wrapping of all chewable and dissolvable pieces/strips/gels within a bulk packet of caffeine-containing FSSF, when the pieces/strips/gels require no further preparation, and the bulk packet contains more than a total of 200 mg caffeine
- restricting caffeine present in FSSF in a liquid form to less than 1% w/v caffeine
- an advisory statement to the effect of 'contains caffeine' on FSSF containing added caffeine
- the new warning statement for FSSF containing caffeine - *Not suitable for children under 15 years of age or pregnant or breastfeeding women: Should only be used under medical or dietetic supervision.*
- the average quantity of caffeine in the NIP

The George Institute believes this approach will help ensure consumers maintain safe and reasonable access to products containing added caffeine/caffeine.

The George Institute notes the limitations of the dietary assessment data (the most recent Australian (2011-12) and New Zealand (2008-09) National Nutrition Survey). In its recent pre-budget submission, The George Institute called for investment to fund a new National Nutrition Survey.² Drawing upon our own experience with FoodSwitch, The George Institute supports government investment in the development and open publication of comprehensive food composition databases including FSANZ's Branded Food Composition Database to improve transparency in the food supply for all stakeholders.

The George Institute is pleased with the progress to date on P1056 Caffeine Review.

¹ At this time, capacity constraints have limited our ability to extract data from FoodSwitch for this submission.

² [The George Institute for Global Health 2025-26 Pre-Budget Submission | The George Institute for Global Health](#)