



**National Council of
Women of New Zealand**
Te Kaunihera
Wahine O Aotearoa

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23 April 2004

S04.15

**Submission to the Food Standards Australia New Zealand
on Proposal P278 - Use of Nicotine and Nicotianna Species in Food**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. It has 33 branches throughout the country attended by representatives of those societies. The Council's function is to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

The National Council of Women New Zealand (NCWNZ) is very pleased to be able to add our voice to this subject which we would give a high priority to. Two Standing Committees have contributed to this reply, Health and Social Issues, to give us a broader opinion from our membership. We have within our membership firsthand knowledge of working with people with alcohol, drugs and substance abuse, and all say the Nicotine is the hardest to overcome. Therefore we would not be able to support any measures that allowed the addition of Nicotine or Nicotianna to any product.

NCWNZ strongly supports Option 1:

***“Prohibit the use of Nicotianna species and all substances derived therefrom in all foods.*”**

To support this we would offer the following explanation.

NCWNZ believes that Nicotine in any form added to food is not appropriate when it has been conclusively shown that nicotine is a harmful substance. If it is not banned by law then it leaves a backdoor method for people to become addicted to nicotine and maybe move on to smoking. This would be inappropriate to say the least in a country where there is a strong move to discourage people from smoking for the sake of their health, and that of others.

Our membership feels that if the move is made to ban these substances then Food Standards Australia New Zealand (FSANZ) would be the body through which this would be best regulated. If however, it is decided that there is some therapeutic value in adding nicotine or other products from the Nicotianna species to foods, the control and regulation should lie with the Medicines Control Authority.

We feel that it is vital to maintain consumer confidence in the safety and regulation of food standards to ensure that foods are not being tampered with to suit the end results of others, e.g. BATA.

We would very strongly disagree with BATA's last comment, “BATA strongly recommend that FSANZ does not assume oversight for an area more appropriately the purview of the tobacco control authorities.”





We would also disagree with the comments from VicHealth Centre for Tobacco Control (Dr Ron Borland), to quote one comment, “Support a modified version of option 2- Allow the use of Nicotiana species in all foods but restrict the level of nicotine to the level demonstrated to be safe and to not be therapeutic or psychoactive”. Our question to this would be what is a safe level for children. If the products mentioned in the document, currently available in the USA and over the Internet as “bottled water with up to 2 cigarette equivalence, and lollipops marketed under brand names Nicostop, Nicopop and Likatine” became available here it would not be long before they found their way into the hands of children.

Our foremost concern must be for the health of the New Zealanders and realise that the cost to the country already is high as it stands now, so we do not want to see this getting worse.

Just to state again we very strongly support Option One. In the event that it was decided that there is some therapeutic value in adding Nicotiana species to food we would want to see this controlled by the Medicines Control Authority.

Beryl Anderson
National President

Christine Rattray
Convener, Social Issues Standing Committee