



P1037-Amendments associated with Nutrition Content and Health Claims

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The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on P1037- Amendments associated with Nutrition Content and Health Claims for Food Standards Australia New Zealand (FSANZ).

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DAA interest in this consultation

DAA advocates for a safe, nutritious and sustainable food supply which provides food security for all Australians. DAA considers that food labelling regulation makes an important contribution to a safe food supply.

DAA is responsible for the Accredited Practising Dietitian (APD) program which is the foundation of self regulation of the dietetic profession in Australia. As experts in nutrition, APDs assist the population with the translation of food labels and health claims. APDs also provide nutritional expertise relating to the development of food products and labelling that must comply with the current regulatory framework.

Recommendations

DAA supports the proposed amendments.

Discussion

Code reference	Proposed amendment	1. Do you support the proposed amendments? Why/why not?	2. Expected impact and costs (including no impact)
Standard 1.2.7, Schedule 1, conditions for claims about lactose, salt or sodium and omega-3 fatty acids	The 'average quantity' of additional nutrients for lactose, salt/sodium and omega-3 fatty acid claims will be required to be declared in accordance with the prescribed format for NIPs. The requirements will be moved from Standard 1.2.7 to Standard 1.2.8, where other similar nutrition information requirements are located.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact
Standard 1.2.7, Schedule 5, method for determining the nutrient profiling score (NPS).	Schedule 5 will be amended to add that the average quantity (rather than quantity) of nutrients is used in the NPS calculation and that the average quantity of protein and dietary fibre is to be based on per 100g or mL, depending on the units used in the NIP.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact

Standard 1.2.8, Clause 7B Percentage DI or RDI information presented outside the panel	It will be clarified that the %DI for energy alone (without other %DI information) is permitted to be presented on a label outside the NIP. It will also be made clear that the %DI for dietary fibre is permitted to be declared outside the NIP if it is also declared in the NIP, together with the %DI for the prescribed nutrients.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact
Standard 1.2.8, conditions for small packages, clause 8	The provisions for small packages will be amended to be consistent with existing provisions for NIPs, i.e. that the minimum or maximum amounts are only permitted to be declared in an NIP if the claim is about a food standardised in Standard 2.4.1 or 2.4.2 (edible oils or edible oil spreads) and if the claim relates to polyunsaturated fatty acids or monounsaturated fatty. For all other declarations, the <i>average quantity</i> must be indicated.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact
Standard 1.2.8, conditions for small packages, clause 8	For claims about dietary fibre, sugars or any other carbohydrates, the ‘average energy content’ will be required to be declared. Average energy content is to be calculated in accordance with the standardised method in clause 1 of Standard 1.2.8.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact
Standard 1.2.8, conditions for small packages, clause 8A	The provisions for small packages making claims about dietary fibre, sugars or any other	Yes – support. It addresses a number of inconsistencies and	No impact

	carbohydrates will be amended to be consistent with existing provisions for NIPs on larger packages and with other declarations on small packages, as was intended i.e. the average quantity of these substances must be declared, per serving.	lack of clarity associated with Standard 1.2.7.	
Standard 2.9.2 – Food for Infants, clause 9	Clause 9 of Standard 2.9.2 is amended to clarify that the clauses about food in small packages in Standard 1.2.8 do not apply to food for infants.	Yes – support. It addresses a number of inconsistencies and lack of clarity associated with Standard 1.2.7.	No impact
Claim requirements in Standards 1.2.7 and 1.2.8	An exemption will be provided for the star rating, the energy icon and the nutrient icons for sodium, saturated fat and sugars, as trademarked, from claim requirements in Standards 1.2.7 and 1.2.8.	Yes – support. Not requiring additional labelling requirements is likely to support further industry implementation of this voluntary scheme.	No impact
Additional comments: DAA recommends the addition of the percentage FVNL details to the ingredient list. All ingredients included in the NPS should have the percentage value included for regulatory purposes, specifically to allow for verification of the NPS.			