

## Simplot Australia Submission: P1037 – Amendments associated with Nutrition Content & Health Claims

### Submitter name and company name:

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Simplot Australia supports the proposed amendments to Standard 1.2.7 as detailed in Proposal P1037.

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	<p>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.</p> <p>The requirements will be moved from Standard 1.2.7 to Standard 1.2.8, where other similar nutrition information requirements are located.</p>	<p>Simplot supports the proposed amendments.</p> <p>Moving the requirements to Standard 1.2.8 will make it easier to find and reduce the risk of missing required information.</p>	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.	Simplot supports the proposed amendments.	No impact.

Code reference	Proposed amendment	1. Do you support the proposed amendments? Why/why not?	2. Expected impact and costs (including no impact)
Standard 1.2.8, Clause 7B Percentage DI or RDI information presented outside the panel	<p>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.</p> <p>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.</p>	<p>Simplot supports the proposed amendments.</p> <p>This allows flexibility for smaller packs where there may be insufficient room for the additional %DI column in the NIP when %DI for energy alone is presented on a label outside the NIP.</p>	No impact.
Standard 1.2.8, conditions for small packages, clause 8	<p>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.</p> <p>For all other declarations, the <i>average quantity</i> must be indicated.</p>	Simplot supports the proposed amendments.	No impact.
Standard 1.2.8, conditions for small packages, clause 8	<p>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.</p>	Simplot supports the proposed amendments.	No impact.

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Standard 1.2.8, conditions for small packages, clause 8A	The provisions for small packages making claims about dietary fibre, sugars or any other 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.	Simplot supports the proposed amendments.	No impact.
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.	Simplot supports the proposed amendments.	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.	<p>Simplot supports the proposed amendments.</p> <p>The Health Star Rating Style Guide when strictly interpreted requires additional nutrition labelling requirements. Therefore the energy, saturated fat, sugars and sodium icons may not have been used on pack with the health star rating if the additional information was not available. i.e. potassium, trans, polyunsaturated, monounsaturated fatty acids and dietary fibre.</p> <p>The proposed amendment will remove this point of confusion and contention.</p>	No impact.
<p>Additional comments:</p> <p>Inclusion in Standard 1.2.8 of the HSR system elements that are considered nutrition content claims should be considered:</p> <ul style="list-style-type: none"> <li>Any additional positive nutrient</li> <li>The words 'high' or 'low' used in conjunction with HSR system</li> </ul>			

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<p>Additional comments:</p> <p>Also a consideration for the Health Star Rating system is to align with the requirements of the NPSC to include fibre in the NIP and %s of FVNL in the ingredient listing when used in the Nutrient Profiling score calculation or in this case the HSR score calculation.</p>			