

23 February 2015

Food Standards Australia and New Zealand,

PO Box 7186

CANBERRA BC, ACT, 2610

Via email: submissions@foodstandards.gov.au

Dear Food Standards Australia New Zealand,

Submission – Consultation Paper

**Labelling Review Recommendation 17:
Per serving declarations in the nutrition information panel**

The Australian Beverages Council (the Beverages Council) is the peak body representing the \$7 billion non-alcoholic beverage industry. The Beverages Council provides a single, united industry voice to a range of stakeholders including government, non-government organisations, media and the general public.

Membership of the Beverages Council comprises over 95% of the non-alcoholic industry's production volume and is comprised of multi-national companies, small and medium business. The Beverages Council has two dedicated category divisions – Fruit Juice Australia and the Australasian Bottled Water Institute, which represents the unique interests of members manufacturing juice and bottled water products respectively.

It is understood that in 2009, the then Australian and New Zealand Ministerial Council for Food Regulation (now known as the Australia and New Zealand Ministerial Forum on Food Regulation (Forum) agreed to a comprehensive independent review of food labelling law and policy. An expert panel, chaired by Dr Neal Blewett AC, undertook the review and the panel's final report, Labelling Logic: Review of Food Labelling Law and Policy (2011) (Labelling Logic) (Blewett et al. 2011), was publicly released on 28 January 2011. Recommendation 17 from Labelling Logic states: That the declaration in the nutrition information panel of amount of nutrients per serve be no longer mandatory unless a daily intake claim is made. The labelling review panel noted that consumers find the declaration of nutrients per serving and percentage daily intake values confusing.

Australian Beverages Council Ltd

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The Beverages Council notes and disagrees

- “that consumers find the declaration of nutrients per serving and percentage daily intake values confusing , and is unaware of any such concerns being raised by industry or consumer groups.”

The Beverages Council believes that the consumer finds confidence and solace in a Nutrient Information Panel (NIP) format that is constant as possible across the Food and Beverage industry(including the per serve column). This is especially of concern with current changes to Front of Pack Labelling where the consumer will be once again challenged by a new proposal as to address their decision making on dietary intake options.

The Beverages Council also disagrees

- “that a simpler approach would be to declare amounts of nutrients per 100 g/100 mL in the nutrition information panel (NIP) (while retaining a statement of serving size) although they acknowledged such an approach would require greater numeracy skills and so should be considered in the context of other, more easily understood nutrition advice being on the food label.”

The Beverages Council believes

- that better reform effort would be spent in the recommended serve sizing to address Health Advocate and Consumer educational concerns, with realistic consumption patterns of particular food and beverages on both a local and international collective approach to develop improved Dietary Guidelines. This unified effort would lead to greater harmonisation in both the international labelling of traded goods and the wellbeing of fellow mankind.

We thank FSANZ for the opportunity to provide this submission regarding **Labelling Review Recommendation 17** and support a **STATUS QUO** on any such proposed reform. [REDACTED]

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Yours sincerely,

[REDACTED]

[REDACTED]

Technical and Regulatory Affairs Manager

