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BioCeuticals Ltd Submission -
FSANZ Consultation: Labelling Review
Recommendation 17 -
Per serving declarations in the nutrition information panel

BioCeuticals is Australia's leading provider of nutritional and therapeutic supplements. Renowned for manufacturing and delivering high quality foods for specific nutritional purposes and integrative medicines to healthcare practitioners, BioCeuticals aims to consistently raise the standards of natural-based therapies.

With quality, innovation and integrity as guiding principles, BioCeuticals is at the forefront of ensuring complementary and alternative medicines (CAMs) become an integral part of the Australian allied healthcare industry.

BioCeuticals has a strong commitment to research, functional formulas and reliable practitioner support. Our supplements are recognized by qualified healthcare practitioners as well as patients; a fact that reflects our reputation as a progressive force in integrative health.

BioCeuticals welcomes the opportunity to contribute to the Consultation on the Labelling Review, recommendation 17.

Following a review of Recommendation 17 pertaining to per serving declarations on the nutrition information panel, please see our responses to the requested information below. However, we would like to express that we do not see a clear benefit to the consumer or industry in implementing the proposed changes and are concerned that the proposed changes are based on outdated evidence.

Question 1: How do you or your organisation use per serving information.

Our organisation uses per serving information on our products as a selling point for specific macronutrients quantities including low carbohydrate, high protein, low fat and low lactose and as an education tool for our consumers as part of a lifestyle program. The inclusion of per serving information allows the consumer to make quick and accurate comparisons with similar products available on the market.

Question 2: Are there any particular food categories or types of food packages (e.g. single serve packages) for which per serving information is particularly useful? If so what are they? Explain why the information is useful.

Per serving information is particularly useful in the Formulated Meal Replacement and Formulated Supplementary Sports Food categories.

In the Formulated Meal Replacement standard it enables consumers to easily compare macronutrient content of different products to decide if a product is suitable for their specific requirements in managing/maintaining body composition, such as those following a low carbohydrate/high protein diet.

In the Formulated Supplementary Sports Food category it means consumers can easily ensure they are ingesting adequate quantities for their specific purpose, for example high carbohydrate intake to support high intensity endurance exercise activity.

Question 3: The Labelling Review recommendation suggests that per serving information be voluntary unless a daily intake claim is made. Do you support this approach? That is, do you think declaration of per serving information in the NIP should be mandatory if a daily intake claim is made (e.g. %DI or %RDI)? Give reasons for your answer.

In principle, we support the added flexibility for industry to opt to include per serving information or not depending on the inclusion of daily intake claims as deemed relevant for specific product labels. We agree that if a daily intake claim is included, per serving information should be mandatory, as it will help ensure industry compliance and make it easier for the consumer to ensure they are consuming the per serving quantities that is suitable for their individual needs.

In practice, we would consider the per serving information to be crucial for consumers to make balanced and informed choices when comparing similar products, regardless of whether a %DI or %RDI claim is made.

Question 4: Q4: As noted above, there is currently variation in the format on NIPs on food labels because of voluntary permissions for the use of %DI labelling and the option to include a third column for foods intended to be prepared or consumed with at least one other food. If per serving information in the NIP was voluntary this would result in more variability in the format of NIPs across the food supply. Do you think this would be a problem? Why/why not?

We do not believe it would present any more or less of a problem than the current system of mandatory per serving information on food labels.

Question 5: If per serving information in the NIP was voluntary, do you think the inclusion of per serving information in the NIP should be mandatory when a nutrition content claim about vitamins, minerals, protein, omega-3 FA or dietary fibre is made? Given reasons.

We agree with this proposal as it would make it easier to determine if a product complies with the requirements to make specific nutrition content claims, potentially reducing the occurrence or opportunity for companies to make such claims without meeting the requirements. This would be more difficult to monitor if such information was not included on the label.

Question 6: If per serving information on the NIP was voluntary, do you think the inclusion of per serving information on the NIP should be mandatory in any other specific regulatory situations? Explain answer.

We do not see any other regulatory situations where this would be appropriate. However, we would like to repeat our previous point that we would consider the per serving information to be crucial for consumers to make balanced and informed choices when comparing similar products, regardless of whether a %DI or %RDI claim is made.

Question 7: What additional studies examine consumer use and understanding of per serving information in the NIP on food labels? Please provide a copy of studies where possible.

We do not have any additional evidence to include.

Question 8: From your perspective, what are the advantages and disadvantages of per serving information in the NIP being voluntary? Please provide evidence where possible.

The main advantages in the implementation to this proposal is increased flexibility for industry.

However we feel that the disadvantages outweigh this, including a lack of any real impact for the end-user, increased burden to the consumer of converting 100g/mL to serving size quantities, potential cost to industry of changes made and increased difficulties in monitoring compliance regarding upper limits of restricted ingredients.

Question 9: Do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary?

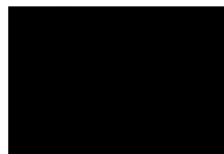
We do not see any benefit to the consumer in not disclosing this information and therefore do not support the proposal for it to be voluntary.

SIGNATURE

NAME

ORGANISATION

EMAIL/FAX/PHONE DETAILS



FIT-BioCeuticals Pty Ltd

