

5 May 2015

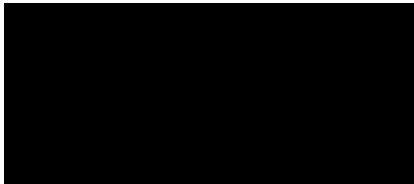
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1101 Commencement of Dietary Fibre Claim Provisions.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION 1101 COMMENCEMENT
OF DIETARY FIBRE CLAIM PROVISIONS
5 May 2015

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions – Application A1101 Commencement of Dietary Fibre Claim Provisions***.

New Zealand Food & Grocery Council

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

Application A1101

The Application sought to delay the commencement of provisions in Standard 1.2.7 – Nutrition, Health and Related Claims – for nutrition content claims about dietary fibre, from 18 January 2016 to 18 January 2017. This was proposed following a review by FSANZ that concluded that the changed qualifying criteria should be retained. In reaching this conclusion in 2013, the 3 year transition period for industry to comply with the changes was effectively reduced to only 2 years. An additional year was therefore sought which would align with the 3 year transition period for all other claims provided for in Standard 1.2.7.

Comment

NZFGC maintains its support for the extension of the transition period for changes to the qualifying criteria for dietary fibre nutrition content claims to 18 January 2018.

NZFGC understands that some businesses may have higher costs if the transition period is shortened. There are no other impacts that would offset these costs. As noted in our earlier submission, it is also the case that formulation and label changes for dietary fibre claims may well be coordinated with changes to accommodate the voluntary Health Star Rating scheme which is to be evaluated for uptake after five years (mid-late 2019).

With less than a year of the transition period left to run for Standard 1.2.7, businesses that awaited the outcome of the FSANZ review (which was the prudent thing to do given changes could have been made as a result of the review) before undertaking a review of formulations or labels are now significantly disadvantaged when compared to those businesses making changes to accommodate any of the other claims covered by Standard 1.2.7.

A change in the transition period to 18 January 2018 will assist businesses meet the requirements of Standard 1.2.7 at least cost.