

5 May 2015

Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610

**Re: A1101 – Commencement of Dietary Fibre Claim Requirements**

To whom it may concern,

Thank you for the opportunity to provide feedback on the application seeking to delay the requirement to comply with the qualifying criteria for nutrition content claims about dietary fibre in Standard 1.2.7- Nutrition, Health and Related Claims.

DAA responded to the November 2014 consultation regarding this standard with the preference for the commencement date being extended to 18 January 2017 (attachment 1).

DAA's preference for the commencement date of the provisions in Standard 1.2.7 – Nutrition, Health and Related Claims for nutrition content claims about dietary fibre, remains unchanged - to delay the requirement until 18 January 2017.

DAA note FSANZ's acknowledgement of our suggestion to provide information to consumers to avoid confusion regarding types of claims during the transition period.

Regards,



Professional Services Dietitian

## **Attachment 1: DAA response to November 2014 consultation**

Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610

November 2014

### **Re: A1101 – Commencement of Dietary Fibre Claim Provisions**

To whom it may concern,

Thank you for the opportunity to provide feedback on the commencement of dietary fibre claim provisions.

DAA provided a submission in August 2013 on the qualifying criteria for nutrient content claims about dietary fibre. In this submission, DAA outlined its concerns regarding the nutrient content claims for dietary fibre and that raising the qualifying criteria for dietary fibre would disadvantage unprocessed foods. As part of this submission DAA recommended:

- Further work be done to provide an evidence base on which to make this decision
- More discussion around the technical implications for food formulation related to each qualifying criteria
- Modelling of the potential impact on dietary patterns of each qualifying criteria
- Educational materials are developed for professionals and consumers to explain the difference between the types of claims.

As DAA is not in support of the outcomes of the previous consultation, the option to change the commencement date to 18 January 2017 is preferred.

With the change to commencement date, DAA does acknowledge that there is a possibility of claims based on the old and new criteria being in the market place at the same time. This may cause consumer confusion. DAA suggests FSANZ communicate this via the consumer section of the FSANZ website and through a media release announcing the transition. These communications should highlight that there may be some small differences in the products that display claims for dietary fibre on packaging as a result of the new standard coming into effect in early 2016.

#### **Question 10**

Please indicate your preference for the commencement date of the provisions in Standard 1.2.7 – Nutrition, Health and Related Claims for nutrition content claims about dietary fibre.

Please check the appropriate box.

- ☐ **Retain** 18 January 2016  
☒ **Change** to 18 January 2017  
☐ **No preference** for either date

Regards,



Professional Services Cadet Dietitian