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██████████
Chief Executive Officer
Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610
submissions@foodstandards.gov.au

Submission from the Victorian Health Promotion Foundation (VicHealth) to FSANZ Proposal P1030: Health Claims – Formulated Supplementary Sports Foods & Electrolyte Drinks

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Thank you for the opportunity to respond to the draft food regulatory measure to permit formulated supplementary sports foods and electrolyte drinks and drink bases (EDs) to carry health claims related to their respective purposes.

Since our establishment as a statutory health promotion body by the Victorian Government in 1987, we have had a strong focus on [promoting healthy eating](#). Under the [VicHealth Action Agenda for Health Promotion](#) we have a 10-year goal of more Victorians adopting a healthier diet, with a three-year priority of ensuring that more people are choosing water and healthy food options.

Our current Healthy Eating program includes an initiative to increase water consumption and decrease consumption of sugar-sweetened beverages (SSBs), including sugar-sweetened soft drinks, energy drinks, fruit drinks, sports drinks, ready-to-drink iced tea, flavoured water and cordial.

Our focus and expertise provide us with a strong understanding of the importance of creating a legislative and regulatory environment that promotes healthy food and beverage choices.

VicHealth does not support the draft food regulatory measure outlined in Proposal P1030.

VicHealth is of the view that there is a high likelihood of unintended negative population health impacts associated with the proposal, specifically in relation to excess energy intake in adults and children. We strongly recommend that FSANZ considers the key issues provided overleaf when assessing the proposal.

Victorian Health Promotion Foundation

Ground Floor, 15–31 Pelham Street, Carlton VIC 3053
PO Box 154, Carlton South VIC 3053, Australia
T +61 3 9667 1333 F +61 3 9667 1375
E vichealth@vichealth.vic.gov.au W vichealth.vic.gov.au
ABN 20 734 406 352

Patrons

The Honourable Alex Chernov AC QC
Governor of Victoria (Patron-in-Chief)
Sir James Gobbo
Dr Nigel Gray AO
Professor Emeritus
Sir Gustav Nossal AC CBE

1. There are significant health impacts associated with SSB consumption, as acknowledged in the Australian Dietary Guidelines

SSBs are the largest source of sugars in the Australian diet, and include sugar-sweetened sports and electrolyte drinks (EDs). High intake of SSBs contributes to excess sugar and kilojoule intake, and is associated with poorer health outcomes such as increased risk of weight gain and tooth decay. With nearly two thirds of Australians currently overweight or obese, excess kilojoules consumed through SSBs are a significant concern.

In consideration of the evidence associating SSB intake with poor health impacts, the 2013 [Australian Dietary Guidelines](#) recommend limiting intake of drinks containing sugars, which includes sugar-sweetened sports drinks. VicHealth is concerned that Proposal P1030, where EDs can carry health claims, will refute these evidence-based and government-endorsed guidelines, potentially leading to an increased risk of excessive weight gain and other health issues for both children and adults.

2. With limited indication for consumption of EDs as part of a healthy diet, there are risks of misleading health claims that do not support informed consumer choice

[Sports Dieticians Australia](#) recommends water as the suitable fluid during physical activity of low intensity and duration less than 45 minutes, and recommends sports drinks for high intensity and long duration physical activity.

Current data on physical activity levels indicate that less than half of Australian adults meet the national guidelines for physical activity. As a result, the majority of Australians are unlikely to require EDs, and should be limiting consumption of these beverages as per the Australian Dietary Guidelines.

VicHealth strongly supports initiatives enabling people to make informed food choices. There is a risk that health claims on EDs will lead to a perception that these products are part of a healthy diet, without consideration of their limited need in the average Australian's diet and the risk of overconsumption of added sugar.

3. There are currently high levels of consumption, particularly by children and in sport

A core component of VicHealth's work is promoting health through sporting and broader physical activity environments. The rise in popularity, consumption and promotion of EDs through sports participation, advertising and sponsorship has been noted by our partners, and this presents a concern specifically in regards to children.

Only one in five Australian children aged 5–17 years achieves the recommended one hour of physical activity per day, which is far lower than the proportion of adults achieving recommended levels. At the same time, overweight and obesity rates in children are increasing to epidemic proportions. As outlined above, the physiological need for EDs is limited. The increasing consumption of sugar-sweetened varieties of these drinks is contributing to increased risk of weight gain in children.

VicHealth strongly believes that the inclusion of health claims on EDs will increase the unhelpful association between unnecessary SSBs and physical activity, potentially contributing to overconsumption of sugar by children.

For further evidence to support the above recommendations, we refer you to the Obesity Policy Coalition's submission responding to this proposal.

VicHealth would welcome the opportunity to further discuss the proposal and its health impacts with FSANZ. [REDACTED]

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Yours sincerely

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Jerril Rechter
Chief Executive Officer