



strokefoundation

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Patron in Chief:
Her Excellency
Ms Quentin Bryce AC
Governor-General of the
Commonwealth of Australia

Patrons:
David Brownbill AM
Sir Gustav Nossal AC
Lady Southey AM

Dear Food Standards Australia New Zealand

Re: P293 – Nutrition, Health and Related Claims Revised Draft Standard 1.2.7 and Regulation of Fat-free and % Fat-free claims.

National Stroke Foundation

The NSF is the only national not-for-profit organisation working with governments, health professionals, carers, stroke survivors and all Australians to specifically minimise the impact of stroke, a disease which will affect one in six people worldwide in their lifetime and which affects one Australian every ten minutes.

The National Stroke Foundation is a member of the Australian Chronic Disease Prevention Alliance (ACDPA). The ACDPA is an alliance of five non-government health organisations who work together to promote primary prevention of chronic disease, with particular emphasis on the shared risk factors of poor nutrition, physical inactivity, overweight and obesity and their social determinants.

Summary

The National Stroke Foundation acknowledges the extensive work undertaken by FSANZ to develop this and previous proposals regarding nutrition and health claims. We support measures contained within Standard 1.2.7 particularly nutrient profiling requirements and the revised drafting of Standard 1.2.7. In light of these provisions we encourage FSANZ to adopt the Standard without further delay.

We echo the concern expressed by the ACDPA that the proposed amendment to subclause 7(2) of Standard 1.2.8 removes the requirement to accompany percentage daily intake panels with a statement that a person's daily intake may be higher or lower depending on energy needs. We also support the ACDPA's recommendation that consideration of matters related to percentage daily intake information outside the panel or on front of pack is deferred until the Legislative and Governance Forum on Food Regulation's review is complete.

With respect to 'fat free' and 'percentage fat free claims', our organisation is concerned that marketing practices using such claims may promote poor food choices that contribute to the risk factors of stroke. Of particular concern are foods which may be high in sodium and/or energy dense.

The National Stroke Foundation supports the regulation of fat free and percentage fat free claims to meet the nutrient profiling scoring criterion as applied to health claims of low nutritional quality. We support option 3, that fat-free and % fat-free claims are regulated with additional regulatory requirements and that 'low fat' claim be regulated in the same manner to ensure a consistent approach is taken across food products and categories.



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What evidence can you provide that shows consumers are purchasing foods of lower nutritional quality because they are being misled by fat-free or % fat-free claims?

The NSF supports the commissioning of a literature review on the evidence relating to fat-free and % fat-free claims.

Please comment on the possible options for additional regulatory requirements for fat-free and % fat-free claims (option 3) (refer section 8) as follows:

The NSF supports option 3a to introduce specific requirements to regulate fat-free claims using the Nutrient Profiling Scoring Criteria. The NPSC is a ready tool to ensure a consistent approach across food categories. We also support incorporation of a consumer education campaign (as outlined in option 1) to any regulatory approach adopted. Such a campaign should be broader in scope, incorporating fat-free and % fat-free claims within a communications strategy about food labels and nutrition and health claims.

Yours sincerely

Dr Erin Lalor

CEO