

15 March 2012

Food Standards Australia New Zealand
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By email: submissions@foodstandards.gov.au.

Proposal P293: Nutrition, health and related claims / fat free and % fat free claims

The New Zealand Medical Association (NZMA) is New Zealand's largest medical organisation and has a pan professional membership. We have around 5,000 members who come from all disciplines within the medical profession and include specialists, general practitioners, doctors-in-training and medical students.

The NZMA aims to provide leadership of the medical profession, and promote:

- professional unity and values, and
- the health of all New Zealanders.

The key roles of the NZMA are to:

- provide advocacy on behalf of doctors and their patients
- provide support and services to members and their practices
- publish and maintain the Code of Ethics for the profession
- publish the New Zealand Medical Journal.

The NZMA has read the consultation document and the two proposals it contains with interest.

Draft standard 1.2.7 nutrition, health and related claims

We understand that the aim of this standard is to regulate the nature of any claim made and require any such claim to be substantiated (although some general level health claims will be preapproved). The NZMA fully supports this proposal.

Fat free and % fat free claims

The NZMA agrees that products being labelled fat free and X% fat free can be problematic as many products that meet this requirement are still not healthy as they are either high in sugar or sodium. Similarly, the National Heart Foundation's "Pick the Tick" programme is also

problematic in that the approval is given within food categories. This leads to some high fat food items gaining the tick.

For this reason the NZMA has maintained for some time that consideration should be given to the traffic light system as proposed in the UK House of Commons report on obesity. The system gives an energy density rating to all food where red is high energy dense, amber is medium and green is low.

We note however that this option has not been offered. The NZMA considers this to be unfortunate and asks Food Standards Australia New Zealand to reconsider including this as one of the options. Failing that then our preferred option would be 3(a) – Require foods to meet the nutrient profiling scoring criterion, which seems to provide the consumer with the best information as to how healthy a product is of the options provided.

Yours sincerely

Dr Paul Ockelford
NZMA Chair