

**ANZFA No added sugars Proposal**

Brookfarm has been manufacturing premium granolas, mueslis and snacks since 2000. As a start-up and now grown to a medium size business we have seen many changes and born huge economic impacts due to packaging changes from ANZFA and the Australian Government.

We are strong believers in real food made right and your recommended changes re “No added sugars” undermine the concept of real food and whole food.

**Freeze Dried Fruits**

Regarding the “No Added Sugars” proposal you are putting forward, our key concern is the classification of Freeze dried fruit as added sugars

Freeze dried fruit contains the same fibre and nutrition as the whole fruit but in a more concentrated form, thus the amount used in foods is also much smaller, but is still made from the whole fruit.

We have used freeze dried fruits for many years for their flavour and nutrition, including freeze dried raspberries, apples, banana, peach and strawberries – all made from whole fruits. To put these fruits in the category of syrups and sugars is a complete misunderstanding of concentrated sugars and their use in the food industry. We are not junk food confectionery manufacturers, nor are we junk food snack food companies.

Incorporating whole fruits into ambient temperature foods such as mueslis, porridges and granolas using freeze drying as a storage method allows the consumer to get the benefits of the fruits in our products

Australian Native Fruits are also hugely prejudiced under this new proposal Under the new proposal all Australian native Freeze dried fruits would be classed as “added sugars”. **This is prejudicial to the consumers perception of native foods and incorrect that they have been added as a sugar- they have been added for their nutrition and flavour. It will have a flow through effect on the Australian native fruit industry.**

We use freeze dried fruits such as the native Australian “Davidson plum” as it cannot be used fresh in an ambient temperature food. It is one of the most widely used Australian native freeze dried foods. Also falling into this category would be Kakadu plum, lilly pilly, riberry etc.

**Dried Fruits**

Classifying whole dried fruits such as sultanas, currants, dates, figs, cranberries and tart sour cherries as “added sugars” ignores the fact that they are a natural whole food product. Yes they are a concentrated fruit as they are dried but they are used as a whole fruit with all the fibre and nutrition retained.

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Where we do agree with your proposal is when dried fruits are used as a processing aid or binding ingredient in bars, such as date syrup and date paste which are processing aids and do amount to added sugars.

### **Label changes and costs to small and medium producers**

The label changes will affect virtually every food manufacturer in Australia and not just the ones who claim “No Added sugar” and we believe these costings have not been considered when considering support for Australian manufacturers.

We strongly recommend you consider the number of manufacturers impacted, which is every producer using freeze dried or dried fruits and not just those claiming “no added sugar”

If implemented these laws should apply to all food manufacturers without exception, especially imported foods. The previous Australian content regulations did not apply to junk and snack food manufacturers or imported foods, imposing the largest costs on the smallest Australian producers.

### **Summary**

Brookfarm submits that the definition of added sugars should exclude:

- fruit and vegetable purees, fruit and vegetable concentrated pastes and dried fruit and vegetable powders prepared prepared from the entire edible portion of the fruit or vegetable.
- fruit and vegetable products that are used as processing aids. For example small amounts of juice concentrates used in extruded products.

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