

**Proposal P293 Nutrition, Health and Related Claims
Summary of submissions to the Draft Assessment Report**

20. SMALL PACKAGES – CONDITIONS FOR CLAIMS

Submitter	Group	Comments
New Zealand Food Safety Authority (NZFSA)	Government – New Zealand	<ul style="list-style-type: none"> • The text under clause 10 is not consistent with the approach recommended under 5.3.3.6. This could be a drafting error but it is difficult to comment on this section as it currently stands. • Requests clarification as to why foods sold in small packages are required to state the identify of the reference food and difference in protein content for protein claims, when claims about other properties of food on small packages are exempt from this. • Suggest that item (c) under the conditions for protein claims in the table to clause 11 may have been accidentally omitted from the list of exemptions for food in small packages. • Suggests an editorial note be added to clause 10 stating ‘Any advertising material associated with the food in a small package is to comply with the full requirements.
Community and Public Health, Canterbury District Health Board	Public Health – New Zealand	<ul style="list-style-type: none"> • Do not support food in small packages being given further exemptions from labelling requirements. If room is “found” for health claims then other existing statutory requirements should have been given preference. • Cannot determine the content of clauses 5(2)(d)(iii) and (iv) and 6(1)(iii) and (iv), suggest they should be 5(2)(e)(iii) and (iv) and 6(1)c(iii) and (iv).
National Heart Foundation of Australia	Public Health – Australia	<ul style="list-style-type: none"> • Division 2 10(1)(a) – it is suggested that the correct subparagraph is 5(2)(e)(iii) and (iv). • Division 2 10(1)(c) It is suggested that the correct subparagraph is (6)(1)(c)(iii) and (iv).
National Heart Foundation of New Zealand	Public Health - New Zealand	
NSW Food Authority	Government – Australia	<ul style="list-style-type: none"> • The references in 10(1)(a) of the drafting should refer to paragraph (e). • In relation to 10(1)(d) of the drafting, considers that it is not logical to remove a permission granted to larger packages for information to be presented separately, and questions whether that is the intention.
Food and Beverage Importers Association	Industry – Australia	<ul style="list-style-type: none"> • Supports the lessening of information requirements for small packages when claims are made. It should be recognised that the definition of a ‘small package’ has been in place for many years, but that the information requirements for small packages have continued to grow. Size parameters for a small package were set at a time when nutritional information panels were not required and the ingredient lists were not as detailed as current lists.

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Food and Beverage Importers Association	Industry - Australia	<ul style="list-style-type: none"> Those foods with packaging that is just slightly over the defined 100 cm² need to have nutritional panels, full ingredient lists. Now, where claims are made, labels will have to carry %DI amounts and the accompanying statements. This extra information will make it difficult to ensure all information is presented legibly. In addition, some package types have labels that do not cover the full surface area, i.e. when the package is non-uniform in shape. Suggests that the size of what constitutes a small package be reviewed.
Nestle Australia Limited and Nestle New Zealand Limited	Industry – Trans Tasman	<ul style="list-style-type: none"> Recommend a review of the small package size (see Consequential Amendments). Some small packages will not have sufficient room to legibly carry the extra information that is necessary.
Confectionery Manufacturers of Australasia Supported by CMA’s NSW Branch Queensland Branch SA Branch Victoria Branch Langdon Ingredients CMA NZ Branch, and International Confectionery Association	Industry – - Australia Industry – New Zealand Industry - international	<ul style="list-style-type: none"> Notes there will be additional pressure on producers of small packages triggered by the requirements of draft Standard 1.2.7 with the already limited space available. Mandatory legibility and prominence requirements must also be met. It will be difficult complying with the additional requirements that accompany health claims. No added sugar claims will be accompanied by a statement referencing naturally occurring sugar. Whilst a modified nutrition information panel continues for small packages there is the added requirement to declare %DI in the context of the average adult dietary intake of 8700kJ. A biologically active substance health claim will trigger the additional requirement for the substantiated daily amount to achieve the health effect. Other more complex health claims will naturally consume greater space. In a world where small portions are encouraged to assist in the reduction of obesity, a review of the small package definition may be required, or other labelling compromises offered for small packages to accommodate the most important information.
Glycaemic Index Ltd (GIL) Dietitians Association of Australia (DAA)	Public Health - Australia	<ul style="list-style-type: none"> Does not support any exemptions from small package legislation. If a package itself is too small, manufacturers are able to provide additional information in the form of a shelf talker, neck tie, or fold out label.
The Cancer Council of Australia	Public Health – Australia	<ul style="list-style-type: none"> Do not believe there should be wording exemptions for small packages, as they are able to provide the additional information in the form of a food out label or shelf information. It is important that on a small package food such as a confectionery bar, that the full nutritional information is provided.

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Cadbury Schweppes Pty Ltd	Industry - Trans Tasman	<ul style="list-style-type: none"> • Legibility issues will arise for small packages also required to carry all the mandatory information if a claim is to be made. • The inclusion of an additional column to the nutrition information panel to display the %RDI values as well as the generic statement regarding energy value, and any claims, may result in legibility issues.
<p>Confectionery Manufacturers of Australasia Supported by CMA NSW Branch CMA Queensland Branch CMA SA Branch CMA Victoria Branch Langdon Ingredients CMA NZ Branch</p> <p>Cadbury Schweppes Pty Ltd Nestle Australia Ltd Nestle New Zealand Ltd Nutrinova (Australasia) Pty Ltd and International Confectionery Association</p>	<p>Industry - Australia</p> <p>Industry – New Zealand Industry – Trans-Tasman</p> <p>Industry – International</p>	<ul style="list-style-type: none"> • Seeks clarification with respect to Standard 1.2.8 – Nutrition Information Requirements, Clause 8(1). In particular, Clause 8(1)(a)(ii) and (iii) where a nutrition content or health claim is made in relation to sugars and carbohydrates the declaration of the average quantity of energy, carbohydrate, sugars and dietary fibre present must be declared and clause 8(1)(d) “requires declaration of the average quantity of energy present per unit quantity of the food, where a nutrition content claim or health claim is made that the food is fat-free, sugar free, low joule or any similar term”. • Seeks clarification on the impact of sugar free being regulated by fair trading as proposed. Why partially regulate by providing conditions for the labelling of sugar free in the Code when it is to be regulated outside of the Code? This is another reason for regulating sugar free in Standard 1.2.7, so all requirements relating to this food claim are kept in the one place. • Consequently, this also means that all other sugar related claims, e.g. x% sugar free in particular fall into Clause 8(1)(b)(ii), thereby triggering a more extensive nutritional profile including energy, carbohydrate, sugars and dietary fibre. • Whilst does not support the omission of sugar free claims from draft Standard 1.2.7, believes Clause 8(1)(d) ought to be reworded to capture the x% sugar free in particular, low sugar(s), and reduced sugar(s).

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21. GENERAL LEVEL HEALTH CLAIMS WORDING CONDITIONS AND SPLIT CLAIMS

WORDING CONDITIONS

Submitter	Group	Comments
John Birkbeck (Massey University)	Academic – New Zealand	<ul style="list-style-type: none"> • Item in italics should read “...a healthy diet including a variety of foods...”. Not every food eaten has to be defined as “healthful so long as such foods predominate (has replaced consisting with including) (pg 49 & 51). • The proposal about including specific population subgroups could be extremely cumbersome and he votes against this. There might be occasional exception, e.g. in pregnancy. • Since increasing the selenium intake above a regular requirement does not necessarily increase antioxidant defences, the statement (pg 57) must be much more guarded, such as “selenium can help strengthen antioxidant defences when restored to normal levels”.
Fonterra Co-Operative Group Limited supported by Fonterra Brands Australia (P&B)	Industry – New Zealand Industry – Australia	<ul style="list-style-type: none"> • The proposed insertion of various advisory or disclosure statements such as “a healthy diet consisting of a variety of foods” is considered as restrictive for marketing health benefits while being unnecessary and ineffective for consumers. • These phrases will only serve to cloud or lessen the effect of the intended health benefit message. • Wordiness means claims will cease to be straightforward with their lengthy appearance causing possible consumer confusion and misunderstanding. • This possible message “fatigue” by the public will mean less opportunity for educating people on important health issues. • There are strong inconsistencies demonstrated with FSANZ stipulating phrases pertaining to a total, healthy or varied diet and exercise be included when making claims and at the same time heavily regulating and restricting dietary advice. • If the wording is required, support the ability to communicate the full text on the back of the product label. • Submit that consumer research or evidence from overseas does not support the assertion that claims on particular products would skew consumption towards a particular food. Fonterra’s experience is that claims shift consumers within a food group (e.g. to choose one milk powder over another) rather than between food groups (e.g. so they eat more cheese rather than apples). If anything, claims improve consumer awareness of the importance of a nutritious diet. • The concern that an imbalance in consumer dietary habits will result from claims on the benefits of foods will not be resolved by generic and already familiar messages; instead, practice in recognising and understanding claims on a wide variety of foods is recommended. • Submits that the mandate to stipulate total dietary context – which is dietary advice – contradicts the FSANZ restriction on branded products generally giving dietary advice. It also contradicts the restriction on certain foods (as per the

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<p>Fonterra Co-Operative Group Limited supported by Fonterra Brands Australia (P&B)</p>	<p>Industry – New Zealand Industry - Australia</p>	<p>‘disqualifying criteria’) being able to make claims, implying FSANZ believes that consumers should not be eating these foods even within the context of their total diet.</p> <p>‘Healthy Diet’</p> <ul style="list-style-type: none"> • There is an inconsistency demonstrated by FSANZ as the Food Standards Code: Standard 1.1A.2 states “Any label on or attached to a package containing or an advertisement for a food shall not include the word ‘health’ or any word or words of similar import as a part of or in conjunction with the name of the food”. • The term “healthy” in reference to a diet is being enforced under the new proposal, while the same word in reference to a food is prohibited under the current standard due to being general and vague and therefore misleading. • While advocating the use of the word in claims, does not see this discrimination as being logical and requires explanation as to the reasoning behind the regulation. • With regards to the transitional standard, Fonterra supports the use of words such as ‘health’ and ‘wellbeing’ in claims, if they are accurate, as they are marketing terms. The excuse that they are too broad so as to be misleading is of negligible risk due to the fact they are well understood and recognised. • At the minimum, these words should be able to be used where they can be supported by a more specific rationale. For example, a product may enhance wellbeing through containing a nutrient with a positive impact on the immune system. <p>Varied diet or variety of foods</p> <ul style="list-style-type: none"> • Strongly disagrees with the mandate to include the terms ‘varied diet’ and ‘variety of foods’ in the description of a health benefit. Firstly is untrue - calcium from one source will still help bone mineral density, secondly, it is a way of forcing companies to give dietary advice unrelated to their products. <p>Broad Claims</p> <ul style="list-style-type: none"> • The use of claims with general terms such as ‘healthy’ and ‘wellbeing’ should be permitted as long as they are true. The blanket prohibition of a whole type of claim is not necessary and overly conservative. These are harmless and well recognized marketing terms that are of low risk to the public. • Opposes ban on referral to ‘growth’ on the grounds that a factor that can be measured is therefore able to be substantiated.
<p>National Heart Foundation of Australia National Heart Foundation of New Zealand</p>	<p>Public Health – Australia Public Health - New Zealand</p>	<ul style="list-style-type: none"> • (High level claims) 6(1)(c)(iii) suggests wording is modified to clarify that it the claim relates to the general population, then the population group does not have to be referred to in the claim. • Division 2: 5(2)(f) ‘In one place’ seems too open to interpretation. Suggests <i>‘in close proximity to each other’</i>.

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Queensland Health	Government – Australia	<ul style="list-style-type: none"> The total diet context should require the word ‘nutritious’ with respect to the text regarding variety of foods, to more accurately reflect the first dietary guideline. In the absence of this descriptor, variety of foods could mean variety of confectionery, chips etc.
New Zealand Nutrition Foundation	Public Health – New Zealand	<ul style="list-style-type: none"> Questions whether consumers understand ‘varied and healthy diet’ any better than ‘total diet’ and can they implement such a diet in a regular and satisfying manner. People do not understand ‘diet’ and it often has negative connotations and is associated with restriction. Almost all nutrition advice in this and other documents is related to single nutrients (especially fat, sugar and salt) or to single foods. As a result of the widespread belief that fatty foods are ‘bad’, there is anecdotal evidence supported by some Canadian evidence, that some elderly people following the ‘fat is bad’ philosophy are getting insufficient energy intake to sustain active life. People understand breakfast, lunch and dinner and some food associations with each meal and understand appetite and hunger, and can be educated to understand satiety. People recognise food as a fuel, a source of energy and they eat in a positive, regular, socially acceptable pattern (positive). It is this regular eating pattern, with food variety, which determines their daily intake of energy, macronutrients, micronutrients and non-nutrients. Suggested solution is to avoid the term ‘diet’ and replace with ‘daily eating pattern’ or other innovative, more appropriate, term.
Adecron Food Tech Consulting	Industry – New Zealand	<ul style="list-style-type: none"> Agree with the reference to total dietary context and the close positioning of claim elements.
Cancer Society of New Zealand Inc The Cancer Council of Australia	Public Health – New Zealand Public Health - Australia	<ul style="list-style-type: none"> Agree with the need for health claims to be made in the context of a healthy diet consisting of a variety of foods.
Health Outcomes Team, Auckland Regional Public Health Service	Public Health –New Zealand	<ul style="list-style-type: none"> Concerned by the claim description... “gives you energy” (Nutrition, Health and Related Claims – A guide to the development of a food standard for Australia and New Zealand, p8). Food energy is a poorly understood concept that has been misused by industry for marketing purposes. ‘Energy’ should only be used in terms of the foods actual kilo joule content.
Australian Self Medication Industry	Therapeutic – Australia and Trans Tasman	<ul style="list-style-type: none"> For health claims made within the context of total diet the consumer needs to be clear whether this entails a balanced diet or a modified diet that may involve supplementation with other specific/fortified foods Dietary context is not included in Tables to Clauses 11 and 12, making the claims arising from the use of these substances into therapeutic claims.

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Kellogg (Aust.) Pty Ltd	Industry - Australia	<ul style="list-style-type: none"> • FSANZ have not demonstrated harm to public health and safety with the current system nor demonstrated that consumers would be better informed with the additional information. • The proposed approach poses issues for television advertising, products that make a number of general level health claims and smaller packages. • FSANZ should consider more practical solutions such as a number of claims being made with ‘as part of a varied and healthy diet’ at the end of the list of claims on the side panel or that information supporting split claims could be provided as part of a communication campaign rather than in one place, i.e. the totality of the mediums – TV, pack, web, rather than in ‘one place’.
Australian Food and Grocery Council (Supported by Nestle Australia Ltd and Nestle NZ Ltd, Unilever Australasia, George Western Foods Limited/AB Food and Beverages, Simplot Australia Pty Ltd)	Industry - Australia	<ul style="list-style-type: none"> • Notes while there is reasonable clarity about the conditions around the wording of claims on pack, there is little clarity or comment regarding wording for advertisement purposes. • AFGC stands ready to assist FSANZ in developing an appropriate user guide for advertising health claims.
Sanitarium Health Food Company	Industry – Trans-Tasman	<ul style="list-style-type: none"> • Believes that the complexity of the proposed Standard is increased with the required format for general level health claims wording. The new requirements make claims long and wordy, and possibly less clear to consumers in that the meaning of the claim can get lost in the amount of text required on labels. • Questions whether the Ministerial Council’s Policy Principle regarding appropriate total diet (Draft Assessment Report, Attachment 2, pg 132) requires general level health claims to comply. It could be argued that most general level health claims, which refer to a nutrient’s or food’s contribution to normal physiological processes, are not captured by the policy and therefore should not require the lengthy inclusion of appropriate total diet context. It could also be argued that the role of a specific nutrient in a physiological process occurs irrespective of what else is consumed in the diet. For example, iron is required for red blood cell synthesis; this effect is not dependent on consuming a particular variety of foods or diet. • Recommends removing the requirement for appropriate total diet for general level health claims and retaining it for high level claims on a case-by-case basis. • If the requirement for appropriate total diet for general level health claims is still considered essential, it is recommended that at least some simplification of this requirement can occur. For example, if a product bears several general level health claims, it may be more appropriate to simply state “Consume this food as part of a varied healthy diet.” or similar.

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Meat and Livestock Australia	Industry - Australia	<ul style="list-style-type: none"> • Opposes that all general level claims must state ‘the specific health effect’ of the property of food or the food itself. Understands this will mean claims such as ‘red meat for wellbeing’ are prohibited. Believes the claim ‘red meat for wellbeing’ is supported by sound scientific evidence. • Has been consistently communicating this message since the launch of the ‘Red Meat Feel Good’ campaign in February 2002. ‘Wellbeing’ is defined as a ‘state of being well; healthy; contented’ (Oxford Concise Australian Dictionary). Lean red meat is a source of essential nutrients in the diet, iron, zinc and vitamin B12 which influence overall health and wellbeing. For instance, lean red meat is a source of zinc, a nutrient which supports the immune system (Institute of Medicine, 2000; Ibs et al, 2003), iron for physical performance (Institute of Medicine, 2000) and vitamin B12 for the nervous system (Institute of Medicine, 1998). <p>References:</p> <ul style="list-style-type: none"> • Ibs K, Rink L. (2003) Zinc-Altered Immune Function. J. Nutr;133:1452S -56S. • Institute of Medicine. Food & Nutrition Board. Dietary Reference Intakes for vitamin A, vitamin K, arsenic, boron, chromium, copper, iodine, iron, manganese, molybdenum, nickel, silicon, vanadium and zinc (2000) National Academy Press. Washington, DC. • Institute of Medicine. Food and Nutrition Board. Dietary Reference Intakes: Thiamin, riboflavin, niacin, vitamin B6, folate, vitamin B12, pantothenic acid, biotin, and choline (1998) National Academy Press. Washington, DC.

SPLIT CLAIMS

Submitter	Group	Comments
New Zealand Food Safety Authority (NZFSA)	Government – New Zealand	<ul style="list-style-type: none"> • Supports permission to enable a health claim to be split, so long as the full claim is referred to, and presented elsewhere on the label or in the advertisement. • Believe this area is one which will require careful consideration to ensure it is workable for all forms of advertising, and to ensure that permission to split the claim does not result in the consumer being unlikely or unable to assess the claim in its entirety and therefore being misled, e.g. a television commercial could state the ‘punchy’ part of the claim then simply flash up the claim in its entirety, which if too fast would not be possible to read. • Under subclause 6(2) the words ‘subclause 1(c) should read ‘subclause 1 (d) to be consistent with subclause 5(2)(g).
Goodman Fielder NZ Ltd	Industry, NZ	<ul style="list-style-type: none"> • Not necessary or practical to have all elements of a claim in one place on product packaging. Claims needs to be clear, meaningful and not misleading or confusing for the consumer. • Does not support the suggestion that mandatory prescribed statements such as ‘see back of pack’ be added to the Code.
Parmalat Australia Ltd	Industry, Australia	<ul style="list-style-type: none"> • Supports options provided to manufacturers to allow for splitting of claim information provided the health claim is contained in its entirety somewhere on the package. Questions the need to incorporate a statement advising of the location of the complete claim. Adds unnecessary text to the label. • Recommends that it should be sufficient to have the health claim in its entirety on the pack without the need for a statement directing consumers to its location on the pack.
NSW Food Authority	Government – Australia	<ul style="list-style-type: none"> • The drafting of 5(2)(g) appears to contradict paragraph (f) and suggests that the paragraph should commence with the words ‘notwithstanding paragraph (f)’. Also states that it is difficult to envisage how ‘the property of the food’ alone could be presented separately in the label.
Queensland Health	Government – Australia	<ul style="list-style-type: none"> • Wording of claims must not be split, but should be stated in their entirety in one place on the label. There should also be a minimum font size for claims.
Consumers’ Institute of New Zealand	Consumer – New Zealand	<ul style="list-style-type: none"> • Further guidance is needed on whether split claims will be allowed. Whilst FSANZ has stated that the information needs to be presented in one place, the Draft Assessment Report suggests that a shorter statement on the front of the package will be allowed where the health claim in its entirety is stated elsewhere on the package. This has the potential to mislead consumers.
Australian Consumers’ Association	Consumers - Australia	<ul style="list-style-type: none"> • Does not support the splitting of health claims. • Splitting health claims will do nothing to address the concerns of public health and consumer groups in relation to health claims being little more than marketing. • While food manufacturers will be allowed to make punchy marketing claims about supposed health benefits, the onus will be on consumers to look further to find the truth behind the marketing hype on the front of the pack. • There should also be a minimum font size for health claims to ensure that the full health claim is legible. This should also apply to television advertisements. The full health claim should not be presented in ‘fine print’.

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New Zealand Food and Grocery Council (FGC)	Industry – New Zealand	<ul style="list-style-type: none"> • Recognition that suppliers need to supply information in a location separate to the claim in its entirety and the options suggested in para 5.3.3.5 are welcome and sensible.
Nestle Australia Limited and Nestle New Zealand Limited	Industry – Trans Tasman	<ul style="list-style-type: none"> • Recommend that industry are consulted in relation to provision in the user guide of suitable examples of additional statements to accompany split claims, as industry has expertise in communicating such matters to consumers.
Health Promotion Unit, Taranaki District Health Board	Public Health – New Zealand	<ul style="list-style-type: none"> • The information, in its entirety, should be placed on the front of a package. • Split claims should not be permitted.
Nutrition Australia	Public Health - Australia	<ul style="list-style-type: none"> • Wording around split claims needs further clarification. • Note FSANZ has stated that the information is to be presented in its entirety in one place, however there is the option of shorter statements on the front of the package. Does this amount to a split claim? • Believe split claims are potentially misleading as the consumer may only read the ‘punch’ part of the claim. To avoid this, all essential parts of the claim need to be in one place.
Confectionery Manufacturers of Australasia Supported by CMA NSW Branch CMA Queensland Branch CMA SA Branch CMA Victoria Branch Langdon Ingredients CMA NZ Branch International Confectionery Association	Industry – - Australia Industry – New Zealand Industry - international	<ul style="list-style-type: none"> • Supports FSANZ’s proposal to allow a brief health claim on the front of the pack with directions for the consumer to the full statement and the entire claim provided elsewhere on the pack.
Public Health Association of Australia	Public Health - Australia	<ul style="list-style-type: none"> • Believes that all essential elements of the claim should be listed in one place.
The Cancer Council of Australia	Public Health – Australia	<ul style="list-style-type: none"> • Believes the intention should be to specify that health claims cannot be worded in a way as to be a split claim, however the draft Standard opens this up as a loophole for industry to be able to make split claims.
Food Products Association	Industry-International	<ul style="list-style-type: none"> • An allowance for split claims also allows flexibility for abbreviated claims that may be useful to consumers when space is limited. •

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Rosemary Stanton	Public Health - Australia	<ul style="list-style-type: none"> • All essential elements of a claim need to be in one place. • Options proposed for split claims negate the benefits of having the entire claim together. • FSANZ should require the entire claim to be listed in one place and if the back or side of the package is chosen then permission be given to flag on the front that there is more information on the back. • This gives the manufacturer the right to flag that a claim is attached without misleading the consumer, by providing complete information about the product. • For example ‘good source of calcium’ may be inappropriate for a consumer when the full message is read.
Cancer Society of New Zealand Inc Public Health Dietitians	Public Health – New Zealand	<ul style="list-style-type: none"> • Wording around split claims needs further clarification. • It is confusing as to whether split claim will be permissible, as FSANZ has stated that the information is to be presented in its entirety in one place, however there is the option of shorter statements on the front of the package.
The Cancer Council of Australia	Public Health – Australia	
Coles Myer Ltd	Industry - Australia	<ul style="list-style-type: none"> • Considers the need for there to be reference to the placement of the complete statement within the abbreviated statement to be unnecessary as long as the complete claim is included on the label or in the advertisement. At this present, this requirement would effectively prohibit the placement of a logo on the front of product packaging to represent a claim, as the additional wording necessary to link that logo to the complete claim would be too cumbersome. • Believes that as part of the food claim education process, consumers will learn that a complete statement for claims will be located somewhere on the product packaging, and will therefore know where to find full information.
Coalition for a Healthy Australian Food Supply	Public Health - Australia	<ul style="list-style-type: none"> • All essential elements of a claim need to be in one place. • Options proposed for split claims negate the benefits of having the entire claim together. • FSANZ should require the entire claim to be listed in one place and if the back or side of the package is chosen then permission be given to flag on the front that there is more information on the back. • This gives the manufacturer the right to flag that a claim is attached without misleading the consumer, by providing complete information about the product. • Believe it is essential that the consumer only read the claim in its entirety so as to avoid being misled. • For example ‘good source of calcium’ may be inappropriate for a consumer when the full message is read.