



27 February 2015

Food Standards Australia New Zealand  
Boeing House  
55 Blackall Street  
BARTON ACT 2600

Attention: Standards Management Officer

**Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel**

The Food & Beverage Importers Association (“FBIA”) welcomes the opportunity to respond to the Consultation Paper for “Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel”. By way of background, the FBIA is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.

*Recommendation 17* is one of the 61 recommendations made by an independent expert panel at the conclusion of its 2011 review of food labelling law and policy. The panel reported that consumers have found the presentation of the nutrition information panel “confusing, if not misleading.” This was particularly the case in relation to the declaration of amounts of nutrients per serve and the practice of nutrient declaration as a percentage of daily value. Apart from these comments, there does not seem to be in the Final Report any other reason or data to support the recommendation.

We would agree that there are doubts about the effectiveness of the current NIP format in communicating key nutrition information to consumers. This is shown by the development of the Food Star Rating system. This recommendation proposes, however, to change only part of the NIP and there is no evidence to indicate that the recommendation will lead to less confusion about nutrition information.

Accordingly, the FBIA does not see the benefit of making the proposed change without an overall review of the effectiveness of the NIP. The association supports the position of the Australian Food & Grocery Council that reform of nutrition information labelling should be undertaken as a full policy review rather than by piecemeal exercise.

**Food & Beverage Importers Association**

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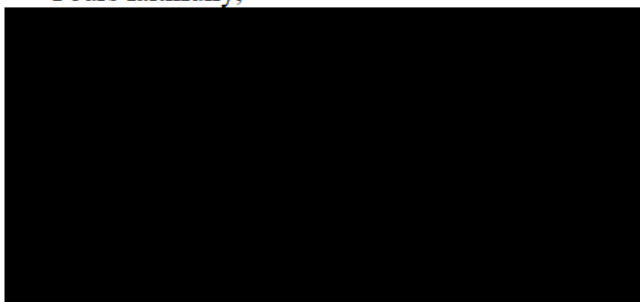
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Should you have any questions on the above, please do not hesitate to contact me.

Yours faithfully,



A J Beaver  
Secretary