



17 December 2025

Position paper

Nutrition information panel review

Food Standards Australia New Zealand (FSANZ) undertook a holistic review of the nutrition information panel (NIP) to determine whether regulatory changes to the Australia New Zealand Food Standards Code (the Code) are warranted to better support consumers to make informed food choices.

The purpose of the NIP in Australia and New Zealand is to provide consistent, meaningful, and accurate information about the nutritional content of foods, to enable consumers to make informed food choices in-line with dietary guidelines.

The review considered whether the NIP continues to meet its intended purpose given changes in the food supply, population and policy environment over the past 25 years and whether any regulatory change is required. It carefully examined previous work on nutrition labelling, relevant ministerial policy guidelines, Australian and New Zealand dietary guidelines, overseas and international regulations, new and existing consumer research, estimated costs of label changes and stakeholder views.

FSANZ's position is that the NIP continues to meet its intended purpose and no regulatory changes to the Code are necessary at this time.

The NIP is a valued, trusted and used source of nutrition information for consumers. It effectively balances consumer use and understanding against international alignment and industry needs.

Elements of the NIP were identified as challenging for some consumers. Opportunities exist for the wider food system to better support consumers to make informed food choices in-line with dietary guidelines, including:

1. Increasing the availability of the HSR system
2. Supporting nutritional literacy in the population to empower consumers
3. Providing industry guidance to promote consistency and build consumer trust.

The review provided a valuable opportunity to gain a contemporary understanding of the NIP and consider its relationship with front-of-pack (HSR) nutrition labelling to support consumers to make healthy and informed food choices. If the HSR system is not mandated, FSANZ may consider whether the NIP could better support consumers to make healthy food choices in the absence of a front-of-pack scheme.

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Introduction

Food Standards Australia New Zealand (FSANZ) examined consumer use and understanding of the nutrition information panel (NIP) to assess whether regulatory changes to the Australia New Zealand Food Standards Code (the Code) are warranted to better support consumers to make informed food choices in-line with dietary guidelines.

Background

This review considered whether the NIP continues to meet its intended purpose given changes in the food supply, population and policy environment over the past 25 years, and whether any regulatory change is required.

The purpose of the NIP in Australia and New Zealand is to provide consistent, meaningful, and accurate information about the nutritional content of foods, to enable consumers to make informed food choices in-line with dietary guidelines.

Consistent with the dietary guidelines in Australia and New Zealand, the target population for the NIP is the general population and not those managing complex medical or dietary conditions. Supporting informed food choice also includes providing information for consumers to validate nutrition and health claims made about food products, reducing the risk of consumer confusion leading to claims being potentially misleading or deceptive.

The NIP review was conducted in parallel with preparatory work for potential mandating of the Health Star Rating (HSR) system should the final uptake target (70% of intended products by 14 November 2025) not be met. This concurrent work provided a valuable opportunity to consider the relationship between front-of-pack (HSR) and back-of-pack (NIP) nutrition labelling in supporting consumers to make healthy and informed food choices.

Previous reviews of nutrition labelling

FSANZ's review of the NIP builds on previous work to strengthen nutrition labelling. A 1999 review, [Proposal P167 – Review of nutrition labelling](#), established the foundation for mandating the NIP in the joint Code based on consumer evidence that a consistent prescribed format supported consumer understanding and use.

In 2009, food ministers agreed to a comprehensive independent review of food labelling law and policy. Conducted by an independent expert panel, the findings of the review were published in 2011, in the report [Labelling Logic: Review of Food Labelling Law and Policy](#). In December 2011, food ministers agreed on a response to the recommendations contained in the review. As part of this government response, FSANZ undertook [an analysis of several recommendations in the report](#), and commissioned a literature review to inform that analysis.

Principles and scope

FSANZ's review of the NIP, as well as the parallel preparatory work for potential mandating of the HSR system, was guided by three overarching principles:

1. Enhance consumer use, understanding and trust
2. The HSR system and the NIP complement and support each other
3. Any potential standards developed or amended are practical to implement and enforce.

The NIP review focused on the information required in the NIP, how it is presented and whether it continues to support consumers to make informed food choices in line with these three principles. Specifically, the review examined:

- the prescribed format (the design and layout of the NIP, including order of nutrients)
- per serving information
- percentage daily intake (%DI) and percentage recommended dietary intake (%RDI) information
- included nutrients
- terminology used for nutrient declarations
- expressions for declaring average quantity (i.e. units of measurement)

The role of the NIP in supporting other labelling elements beyond the HSR system, such as nutrition content and health claims, was also considered.

Out of scope were requirements for when a NIP must be displayed, nutrient reference values (as these are being reviewed under [Proposal P1047](#)), legibility (as this is a broader issue across the Code) and nutrition information specific to certain foods (e.g. calcium in chewing gum or infant foods).

Inclusion of interpretive labelling elements (e.g. high/low nutrient descriptors) in the NIP were also out of scope, as the HSR system is intended to provide an interpretive summary of nutrition information. If the HSR system is not mandated, FSANZ may consider whether the NIP could better support consumers to make healthy food choices in the absence of a front-of-pack scheme.

Our approach

FSANZ assessed the purpose of the NIP against the available evidence, consisting of previous work on nutrition labelling, relevant ministerial policy guidelines and Australian and New Zealand dietary guidelines, dietary consumption surveys, overseas and international regulations, new and existing consumer research, estimated costs of label changes and stakeholder views.

The evidence base provided a contemporary understanding of how the NIP is used, understood and applied across the food system, supporting FSANZ in determining if Code requirements remain effective and proportionate to their intended purpose.

Stakeholder views

A public call for information ran from 22 November 2024 for eight weeks to gather evidence and perspectives from stakeholders on both the NIP review and preparatory work for potential mandating of the HSR system. FSANZ subsequently published a [What we heard](#) report summarising key themes, which have been used to inform this paper and FSANZ's ongoing analysis.

FSANZ published a [NIP review preliminary position paper](#) on 3 November 2025 to provide stakeholders with an opportunity to comment on our findings and the evidence that informed them. [Appendix A](#) summarises the key feedback themes we received from stakeholders.

Ministerial policy guidance and dietary guidelines

In 2020, the then Australia and New Zealand Ministerial Forum on Food Regulation (now the Food Ministers' Meeting) introduced the [Policy Guideline on Food Labelling to Support Consumers to Make Informed Healthy Food Choices](#). This guideline establishes that food labels should provide adequate information to enable consumers to identify foods that do and do not contribute to healthy dietary patterns recommended in dietary guidelines.

Accordingly, FSANZ's work on the NIP review has had regard to this policy guideline and both the [Australian Dietary Guidelines](#) and the [New Zealand Eating and Activity Guidelines](#), which were developed for health professionals, policy makers and others who support consumers to select and consume healthy diets. They were written to cover the general population, including those with common health conditions.

The dietary guidelines in both Australia and New Zealand emphasise matching energy consumption to individual needs, consuming a wide variety of nutritious foods, and limiting intake of foods containing saturated fat, added salt and sugars, and alcohol.

Consumer research

FSANZ reviewed 15 systematic and narrative reviews to explore potential issues with nutrition panels and evidence gaps. This was supplemented by a rapid review of 15 Australian and New Zealand publications, including references received through the 2024 call for information. Review of individual studies was limited to local research due to the substantial differences in nutrition panels internationally.

Recognising the limited amount of contemporary domestic research, FSANZ commissioned qualitative research to explore how and why consumers use the NIP, barriers to use and how consumers interpret the NIP alongside the HSR. Nine focus groups were held across Australia and New Zealand comprising 68 participants from diverse backgrounds.

The focus group research was supported through a module in FSANZ's 2025 *Consumer Insights Tracker* (CIT), an annual survey of over 1200 Australian and 800 New Zealand consumers. This survey tested how qualitative insights from the focus groups translate to the broader population.

Nutrient reference values and dietary consumption surveys

The [Nutrient Reference Values for Australia and New Zealand](#) (NRVs) provide scientific recommendations for nutrient intakes and were used to assess whether population intakes are adequate. FSANZ drew on national dietary surveys, including the [2011-12 Australian Health Survey](#) and the [2008-09 New Zealand Adult Nutrition Survey](#) to determine general population nutrient intakes relative to the NRVs.

Overseas regulations and international guidelines

FSANZ compared the requirements for nutrition information in four jurisdictions – the United States of America, Canada, Europe, and the United Kingdom – with those in Australia and New Zealand. These jurisdictions were selected because they share similar demographic characteristics, regulatory objectives and standards setting processes, and routinely provide nutrition information in English.

FSANZ also reviewed international guidelines and standards, including the *Codex General Standard for the Labelling of Pre-Packaged Foods* ([CXS 1-1985](#)) and the *Guidelines on Nutrition Labelling* ([CXG 2-1985](#)).

Costs

Recognising that the NIP is a mandatory element of most packaged foods, FSANZ considered the potential regulatory and business costs that could arise from any change to NIP requirements. FSANZ currently estimates there to be around 50,000 food and non-alcoholic stock-keeping units (SKUs) across the Australian and New Zealand food supply that could potentially be impacted depending on the nature of a proposed change to the NIP. These potential impacts were considered alongside the likely public health and consumer benefits to ensure any future regulatory action remains proportionate.

What we found

The findings indicate that the current NIP requirements remain effective in achieving their intended purpose and FSANZ's position is that no regulatory changes are warranted at this time. If the HSR system is not mandated, FSANZ may consider whether the NIP could better support consumers to make healthy food choices in the absence of a front-of-pack scheme.

The following section presents the findings of the NIP review as they relate to a holistic assessment of current Code requirements. Further detail on the assessment findings for individual elements of the NIP can be found in [NIP review preliminary position paper](#).

Consumers trust and use the nutrition information panel

The NIP remains a valued and trusted source of information that consumers use to make informed food choices. FSANZ's 2025 CIT found that more than three-quarters of consumers regard the NIP as both trusted and important to their food choices, with 8 in 10 reporting they use it at least sometimes.

Consumers typically use the NIP in-line with its intended purpose. It is most frequently consulted when assessing unfamiliar products, comparing similar foods, buying products for children, checking nutrient levels and verifying on-pack claims. The NIP is used less often for familiar or indulgent foods.

The evidence also indicates that consumers use the NIP and the HSR system in complementary ways when both are available on pack. Consistent with their respective purposes, the HSR acts as a quick visual cue to the nutritional profile of a food, while the NIP is consulted for more detail. Consumers who are more health conscious are more likely to use and value both labelling elements.

Barriers to understanding exist

Nearly 9 in 10 consumers report having moderate or high knowledge of the NIP. However, several barriers to effective use were identified, including difficulties in physically reading the panel, inconsistent information across products, the use of technical language and abstract measures (e.g. grams), limited personal relevance and time pressures.

Limited nutritional literacy also remains a key barrier. Specific elements of the NIP, such as percentage daily intake (%DI) and 'per serving' information, were found to be more challenging for some consumers to interpret and apply.

Current requirements are balanced

FSANZ's analysis of the available evidence demonstrated that the current NIP requirements effectively balance consumer use and understanding against the flexibility needed by the food industry to incorporate diverse product types and future innovation.

The current NIP requirements are paired with Australia and New Zealand's population. They support healthy dietary patterns and the public health objectives of the joint food system. Mandatory declarations, terminology and formatting requirements are evidence-based, fostering familiarity and trust from consumers and supporting access and understanding of the nutritional information provided.

The requirements are also broadly consistent with Codex standards and incorporate a proportionate degree of flexibility to allow food producers to integrate mandatory information into their product label design without impacting on formatting elements that are important for consumer use. Non-mandatory declarations, or declarations required to substantiate nutrition content or health claims, are integrated into the prescribed format, allowing additional information to be provided to consumers in a familiar and consistent layout.

Opportunity exists to support the intended purpose

While the review identified that some elements of the NIP can be challenging for consumers, FSANZ does not consider that these challenges reflect an intrinsic problem with NIP requirements in the Code. Opportunities for the wider food system to better support these consumers to make informed food choices in-line with dietary guidelines include:

1. Increasing the availability of the health star rating system.

The purpose of the HSR system is to provide a quick simplified summary of the overall nutritional profile of packaged food to support consumers to make informed food choices aligned with dietary guidelines. When comparing similar products, the more stars, the healthier the choice. If the HSR system were to be mandated, the number of products displaying a HSR will increase, providing greater opportunity for consumers to make informed food choices based on the food's overall nutritional profile.

2. Supporting nutritional literacy in the population

The ability of the NIP to support informed food choices depends on adequate nutritional literacy in the population to understand and use the information provided. However, findings from the NIP review highlighted many consumers lack the nutritional understanding to interpret the information in the NIP. FSANZ considers adding or removing information from the NIP would not counter this understanding deficit.

Improving nutritional literacy will empower consumers to use nutrition information when provided. It will require a whole of system approach and appropriate investment.

3. Providing industry guidance to promote consistency and consumer trust

Throughout the review, industry stakeholders expressed a need for clear and practical guidance to assist with meeting their compliance obligations. FSANZ considers enhanced guidance would clarify expectations and promote consistency across the food supply, improving consumer understanding and strengthening public confidence in nutrition labelling.

The NIP review identified several areas for any future consideration of guidance – serving sizes (including the use of contextual household measures), legibility and clarity requirements, and providing nutrition information for online sales.

Conclusions

The NIP review provided a valuable opportunity to gain a contemporary understanding of how the NIP is used, understood and applied across our food system in the context of a front-of-pack (HSR) system. It found the current NIP requirements achieve their intended purpose and effectively balance consumer use and understanding against international alignment and industry needs.

Nutritional literacy in the population remains a key challenge, resulting in barriers for some consumers to understand and use the information provided in the NIP. There are opportunities for the wider food system to better support these consumers to make informed food choices in-line with dietary guidelines.

Appendix A. Stakeholder views on FSANZ's position

FSANZ received 80 submissions to the consultation on the preliminary position paper for the NIP review. This consisted of approximately:

- 41% from public health, academics and consumer groups
- 18% from industry
- 11% from government, and
- 14% from private individuals.

There was strong support for FSANZ's position that no regulatory changes are required to the NIP at this time. Stakeholders from government, public health and consumer groups would like to see more detail on the assessment, research methodology and results used to inform FSANZ's position.

While government, public health and consumer group submitters agreed the NIP did not require significant regulatory change, there remains a strong preference for certain amendments to be made to the NIP. Specifically:

- Including added sugars, dietary fibre and trans fats in the NIP as mandatory declarations.
- Removing voluntary information such as % daily intake (%DI), or % recommended dietary intake (%RDI).
- Reviewing general Code legibility requirements.

Some submitters also advocated for additional mandatory declarations that are beyond the current intent of the NIP. Specifically, a number of submitters requested that potassium and phosphate be included to help people managing complex medical conditions such as chronic kidney disease or heart failure.

Industry and government submissions agreed with FSANZ's position but would like greater guidance to assist food manufacturers to meet NIP requirements and promote consistency in food labelling across the Australian and New Zealand food supply.

Stakeholders recognised the timely work being undertaken by FRSC and FSANZ to address nutrition information requirements for online sales, with public health and consumer groups advocating for all mandatory on-pack information to be made available in online sales environments.

Finally, stakeholders from all groups raised the issue of nutritional literacy and the importance of government-led education to help consumers use and understand the information provided to them. Some stakeholders suggested FSANZ should lead this education, while others recognised it was a broader public health issue.