

18 November 2014

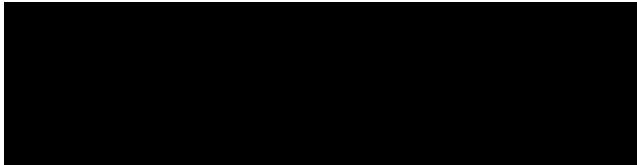
Project Manager  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
NEW ZEALAND

Email: [standards.management@foodstandards.gov.au](mailto:standards.management@foodstandards.gov.au)

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1101 Commencement of Dietary Fibre Claim Provisions.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**CALL FOR SUBMISSIONS – APPLICATION 1101 COMMENCEMENT**  
**OF DIETARY FIBRE CLAIM PROVISIONS**

**20 November 2014**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions – Application A1101 Commencement of Dietary Fibre Claim Provisions***.

**New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

**Application A1101**

The Application seeks to delay the commencement of provisions in Standard 1.2.7 – Nutrition, Health and Related Claims – for nutrition content claims about dietary fibre, from 18 January 2016 to 18 January 2017. This was proposed following a review by FSANZ of the changed qualifying criteria for ‘source’, ‘good source’ and ‘very high’ or ‘excellent source’ descriptors for dietary fibre nutrition content claims that was conducted in 2013. The review concluded that the changed qualifying criteria should be retained. In reaching this conclusion in 2013, the 3 year transition period for industry to comply with the changes was effectively reduced to only 2 years. An additional year is therefore sought which would align with the 3 year transition period for all other claims provided for in Standard 1.2.7.

**Comment**

NZFGC supports the extension of the transition period for changes to the qualifying criteria for dietary fibre nutrition content claims to 18 January 2018.

NZFGC understands that some businesses may have begun the transition process to meet the changed qualifying criteria for dietary fibre nutrition content claims (Questions 3 and 4). However, the changes involve in some instances, formulation changes so as to retain the claims and formulation changes always take time. Whether formulations change or not, labels must change on products currently carrying dietary fibre claims which will not meet the qualifying criteria in future.

It is also the case that formulation and label changes for dietary fibre claims may well be coordinated with changes to accommodate the voluntary Health Star Rating scheme which is to be evaluated for uptake after five years (mid-late 2019).

With little over a year of the transition period left to run for Standard 1.2.7, businesses that awaited the outcome of the FSANZ review before undertaking a review of formulations or labels are now disadvantaged when compared to those businesses making changes to accommodate any of the other claims covered by Standard 1.2.7.

A change in the transition period to 18 January 2018 will assist businesses meet the requirements of Standard 1.2.7 at least cost.