



**Grains &
Legumes
Nutrition
Council**

Cultivating Good Health

Grains and Legumes Nutrition Council

Submission

A1101 – Commencement of Dietary Fibre Claim Provisions

November 2014

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PREFACE

This submission has been prepared by Grains & Legumes Nutrition Council™, the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- GrainGrowers
- Bakers Delight
- Campbell Arnott's
- H.J. Heinz Company Australia
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- UniGrain
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia

INTRODUCTION

The Grains & Legumes Nutrition Council (GLNC) appreciates the opportunity to respond to the consultation on the commencement of dietary fibre claim provisions in the Food Standards Code.

The following GLNC submission has used the template provided by FSANZ and using data from a review conducted by GLNC of grain and legume core foods on shelf in four leading supermarkets in the Sydney area in December 2013 – January 2014.

Part A – Questions for food industry

NOTE: GLNC does not manufacture foods. However, the data provided is taken from a review of grain and legume core foods on shelf in four leading supermarkets in the Sydney area in December 2013 – January 2014.

Question 1

In the table below, please give the total number of products and stock-keeping units (SKUs¹) you currently sell that carry nutrition content claims about dietary fibre (e.g. claims such as *source*, *good source*, and *excellent source* of dietary fibre or synonyms of these descriptors).

Item	Number of products	SKUs ¹
Breads	158	-
Breakfast cereals	176	-
Rice, noodles and other grains	56	-
Crispbreads	12	-
TOTAL Products <i>currently for sale</i> that carry nutrition content claims about dietary fibre	402	

¹ SKU - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

Question 2

In the table below, please give the number of products and SKUs¹ you currently sell that do not meet the requirements for nutrition content claims about dietary fibre in Standard 1.2.7 (i.e. the qualifying criteria) and require changes.

Item	Number of products	SKUs ¹
Products <i>currently for sale</i> that carry nutrition content claims about dietary fibre that <i>do not</i> meet the qualifying criteria in Standard 1.2.7	84	-

¹ SKU - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

Question 3

Before October 2014, did you make labelling changes in order to comply with the requirements for nutrition content claims about dietary fibre?

GLNC estimates that the overall cost to the grains and legume manufacturing industry alone for labelling changes will be at least \$400,000. (Estimates calculated as sum of costs and percentage of products as provided by a range of GLNC Contributors including Bakers Delight, Nestle / Cereal Partners Worldwide, Goodman Fielder, Heinz Australia and Kellogg Australia)

GLNC also understands that given the delay in the decision, many long shelf life products may have packaging still on shelf in January 2016. This will incur costs to industry to write-off large amounts of unused packaging.

Question 4

Before October 2014, did you reformulate products in order to comply with the requirements for nutrition content claims about dietary fibre?

GLNC estimates that the overall cost to the grains and legume manufacturing industry alone for reformulation changes will be at least \$1.7 million. (Estimates calculated as sum of costs and percentage of products as provided by a range of GLNC Contributors including Bakers Delight, Nestle / Cereal Partners Worldwide, Goodman Fielder, Heinz Australia and Kellogg Australia)

Question 5

Between October 2014 and the end of the transition period for Standard 1.2.7, will you be making labelling changes in order to comply with the requirements for nutrition content claims about dietary fibre?

NOT APPLICABLE

Question 6

In the table below, please give the **direct** cost (i.e. for label design and printing costs) of labelling changes required to be compliant with the requirements in Standard 1.2.7 for nutrition content claims about dietary fibre:

- (a) if the transition period remains at 18 January 2016
- (b) if the transition period is extended to 18 January 2017

NOT APPLICABLE

Question 7

In the table below, please give the **indirect** cost (in terms of recalled products, written off products and packaging) of labelling changes required to be compliant with the requirements in Standard 1.2.7 for nutrition content claims about dietary fibre:

- (a) if the transition period remains at 18 January 2016
- (b) if the transition period is extended to 18 January 2017

NOT APPLICABLE

Question 8

Between October 2014 and the end of the transition period for Standard 1.2.7, will you be reformulating products in order to comply with the requirements for nutrition content claims about dietary fibre?

NOT APPLICABLE

Question 9

In the table below, please indicate the number of products that are likely to be reformulated and the cost of reformulation:

- (a) if the transition period remains at 18 January 2016
- (b) if the transition period is extended to 18 January 2017

NOT APPLICABLE

Part B – Question for all stakeholders

Question 10

Please indicate your preference for the commencement date of the provisions in Standard 1.2.7 – Nutrition, Health and Related Claims for nutrition content claims about dietary fibre.

Please check the appropriate box.

- ☐ **Retain** 18 January 2016
- ☒ **Change** to 18 January 2017
- ☐ **No preference** for either date

Please state your reasons in the box below.

Reasons to support your answer
As noted in previous submissions by GLNC to FSANZ, GLNC does not support the increased criteria levels for nutrition content claims about dietary fibre. It is GLNC's position that the changes are not supported by evidence and will lead to inconsistency between public health recommendations for and the communications on foods people are choosing to buy.
Many grain and legume foods have a shelf life over 12 months requiring changes to labelling well in advance of the January 2016 commencement date. In addition, reformulation can take over 12 months. As the decision to retain the levels as in Standard 1.2.7 was not made until late 2013, a number of grain and legume manufacturers delayed making reformulation or labelling changes. Consequently, they are likely to have stock in trade in January 2016 that does not comply with Standard 1.2.7. GLNC is concerned that the costs incurred by manufacturers to write-off packaging may be passed on to consumers.