

# Australian Food and Grocery Council APPLICATION

14 AUGUST 2014

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

**IN RELATION TO:**

APPLICATION TO AMEND STANDARD 1.2.7 – NUTRITION,  
HEALTH AND RELATED CLAIMS



Australian Food and Grocery Council

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 178 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover in the 2012-13 financial year of \$111 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector accounts for over one quarter of the total manufacturing industry in Australia.

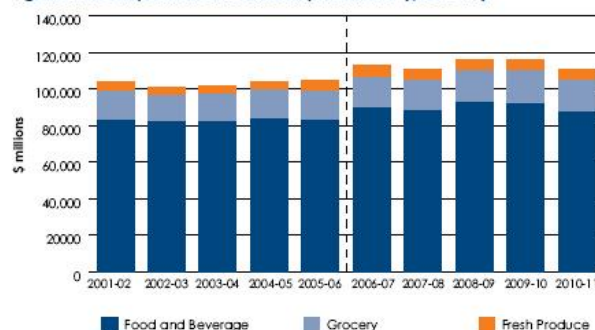
The diverse and sustainable industry is made up of over 25,662 businesses and accounts for over \$50.8 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry spends \$535.8 million a year on research and development.

The food and grocery manufacturing sector employs more than 298,825 Australians, representing about 3 per cent of all employed people in Australia, paying around \$11.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>2</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 4.1: Composition of the industry's turnover (\$2010-11)<sup>4</sup>



Source: Based on ABS, catalogue number 8221.0 and 8159.0

<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

<sup>2</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

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# Australian Food and Grocery Council

## STATUTORY DECLARATION

(As per section 3.1.10 of the Application Handbook 1 September 2013)

I [REDACTED], of 2-4 Brisbane Avenue Barton ACT, **Deputy Chief Executive Officer** of the **Australian Food and Grocery Council**, make the following declaration under the *Statutory Declarations Act 1959*:

1. The information provided in this application fully sets out the matters required.
2. The information provided in this application is true to the best of my knowledge and belief.
3. No information has been withheld that might prejudice this application, to the best of my knowledge and belief.

I understand that a person who intentionally makes a false statement in a statutory declaration is guilty of an offence under section 11 of the *Statutory Declarations Act 1959*, and I believe that the statements in this declaration are true in every particular.

\_\_\_\_\_(signed)\_\_\_\_\_

[REDACTED]

Declared at Canberra on the 14 August 2014

Before me,

\_\_\_\_\_(signed)\_\_\_\_\_

Name: [REDACTED]

Qualifications: Solicitor ACT [REDACTED]

Address: 2 Brisbane Av, Barton ACT 2600

# Australian Food and Grocery Council

## 1. APPLICANT DETAILS

*(As per section 3.1.2 of the Application Handbook 1 September 2013)*

Applicant	██████████
Organisation	Australian Food and Grocery Council (hereafter AFGC)
Address	Level 2, 2-4 Brisbane Avenue Barton ACT 2600 Locked Bag 1 Kingston ACT 2604
Telephone	██████████
Email address	██

## Nature of AFGC Business

*(As per section 3.1.2(f) of the Application Handbook 1 September 2013)*

The AFGC is the leading national organisation representing Australia's packaged food, drink and grocery product manufacturers and brand owners.

AFGC's role is to help shape a business environment that encourages the food and grocery products industry to grow and remain profitable.

AFGC's mandate is to ensure there is a cohesive and credible voice for the industry, advance policies and manage issues to help member companies to grow their businesses in a socially responsible manner.

AFGC's vision for industry is:

- A growing, profitable and sustainable industry - economically, socially and environmentally, providing a secure source of safe food and groceries to Australians and the export market; and
- An industry that partners in educating and empowering consumers, within a best practice regulatory framework that demands the highest standards.

Further details regarding the nature of AFGC business can be found in the Preface to this application on page 1.

## Australian Food and Grocery Council

### Details of Other Parties Associated with the Application

*(As per section 3.1.2(g) of the Application Handbook 1 September 2013)*

The AFGC has the support of the following of the following organisations for this application.

#### Grains & Legumes Nutrition Council

GLNC is a not-for-profit company limited by guarantee and a recognised health promotion charity which is the independent authority on the nutrition and health benefits of grains and legumes. GLNC is supported by Contributors from the entire grains and legumes value chain including growers, research organisations, food manufacturers and industry associations. Representing the Australian and New Zealand industry, GLNC Contributors are part of a powerful, collective voice advocating the nutrition and health benefits of grain and legumes in Australian and New Zealand diets. For more information visit [www.glnc.org.au](http://www.glnc.org.au).

#### New Zealand Food & Grocery Council

The 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.

#### Food and Beverage Importers Association

The Food and Beverage Importers Association (FBIA) is a membership based organisation that provides support and direction on all matters pertaining to imported foods and beverages. FBIA works with government to develop manageable and effective regulation and policy for the food and beverage importing industry and champions the value of imported food and beverages in adding diversity to the Australian food supply.

# Australian Food and Grocery Council

## 1. APPLICATION INFORMATION

### Assessment Procedure

*(As per section 3.1.6 of the Application Handbook 1 September 2013)*

AFGC seeks to proceed with an **unpaid** application for consideration as a General Procedure, Level 1 (maximum of 350 hours).

### Confidential commercial information

*(As per section 3.1.7 of the Application Handbook 1 September 2013)*

This application **does not contain** information that is confidential commercial information (CCI).

### Exclusive capturable commercial benefit

*(As per section 3.1.8 of the Application Handbook 1 September 2013)*

This application **will not** confer an exclusive capturable commercial benefit for the AFGC or any other individual company.

### Status of Similar Applications

*(As per Section 3.1.4 of the Application Handbook 1 September 2013)*

There are no similar applications.

## 2. PURPOSE OF THE APPLICATION

(As per section 3.1.3 of the Application Handbook 1 September 2013)

The AFGC is making this application to amend Schedule 1 of Standard 1.2.7 – Nutrition, Health and Related Claims of the Australia New Zealand Food Standards Code (hereafter the Code) to delay, for 12 months, the commencement date for higher thresholds for nutrition content claims about dietary fibre.

The AFGC is requesting additions to columns 2 and 4 of Schedule 1 for Dietary Fibre along the lines set out in Table 1 below.

**Table 1:** Proposed amendment to Schedule 1 of Standard 1.2.7

Column 1	Column 2	Column 3	Column 4
Property of food	General claim conditions that must be met	Specific descriptor	Conditions that must be met if using specific descriptor in column 3
Dietary fibre	<p>A serving of the food contains at least 1.5 g of dietary fibre unless the claim is about low or reduced dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 2 g of dietary fibre unless the claim is about low or reduced dietary fibre.</p>	Good source	<p>A serving of the food contains at least 3 g of dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 4 g of dietary fibre.</p>
		Excellent source	<p>A serving of the food contains at least 6 g of dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 7 g of dietary fibre.</p>
		Increased	<p>(a) the reference food contains at least 1.5 g of dietary fibre per serving;</p> <p>Effective from 18 January 2017: (a) the reference food contains at least 2 g of dietary fibre per serving; and (b) the food contains at least 25% more dietary fibre than in the same quantity of reference food.</p>



### 3. JUSTIFICATION FOR THE APPLICATION

(As per section 3.1.4 of the Application Handbook 1 September 2013)

#### 3.1. Overview

In its submission to FSANZ on the Consultation paper “Qualifying Criteria for Nutrition Content Claims about Dietary Fibre”, (August 2013), the AFGC recommended that:

*“the qualifying criteria for nutrition content claims about dietary fibre in Standard 1.2.7 revert to the levels in the CoPoNC:*

- Source – 1.5g/serve;
- Good source – 3.0g/serve; and
- Very high or excellent source – 6.0g/serve

*Further, if FSANZ does not recommend reverting back to CoPoNC levels, **industry request an extension of the transition timing for fibre claims to compensate for the delay caused by this review.*** (emphasis added)

In November 2013, FSANZ advised that it had decided to maintain its proposed qualifying criteria and that, in its view, -

*“the remaining two years of the transition period will give most companies sufficient time to comply with the qualifying criteria for nutrition content claims about dietary fibre and therefore is not intending to change the transition period. However, we will consult with jurisdictions involved in the implementation of the Standard to alert them to any feedback from industry on compliance with this particular aspect of the Standard.”<sup>3</sup>*

The AFGC subsequently wrote to FSANZ in February 2014, seeking a review of the decision, adding -

*“At the very least, FSANZ needs to acknowledge that it has, for the past twelve months, created a public understanding that the fibre claim thresholds were to be reviewed, and that there is now a consequent need to allow an extension of time of the same amount before the changes to the fibre claim thresholds come into effect. Some form of informal agreement with enforcement agencies is not acceptable as a solution on this point as company directors can be personally liable for the illegal activities of their entities.”<sup>4</sup>*

The AFGC received a response from FSANZ in March 2014 advising-

*“The Board considered the issues raised in your [AFGC] letter and, whilst acknowledging that industry may have had a differing expectation about the process undertaken in 2013 for reviewing the qualifying criteria for nutrient content claims about dietary fibre, the Board was of the view that the process did fulfil the commitment made by FSANZ in the review report for Proposal P293 – Nutrition, Health and Related Claims. On this basis, the Board agreed not to give further consideration to the qualifying criteria for nutrition content claims about dietary fibre*

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3 Qualifying Criteria for Nutrition content claims about dietary fibre | Standard 1.2.7 – Nutrition, Health and Related Claims, November 2013, <http://www.foodstandards.gov.au/industry/labelling/Pages/Qualifying-criteria-for-nutrition-content-claims-about-dietary-fibre.aspx>, accessed 13.06.14

4 Communication from [REDACTED], CE AFGC to [REDACTED], CEO FSANZ, 17 February 2014.

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*and to maintain the current transition period for Standard 1.2.7. **The Board also noted, as it had done in making its original decision, that industry could lodge a formal application seeking a variation to the relevant part of the standard.***<sup>15</sup> (emphasis added)

### 3.2. Need for the Proposed Change

(As per section 3.14(a) of the Application Handbook 1 September 2013)

Standard 1.2.7 was gazetted on 7 January 2013, with a 3 year transition period commencing 18 January 2013. It was acknowledged by FSANZ at the time that the threshold for fibre claims was an issue requiring further consideration, and that this consideration was not completed until November 2013. In July 2013, FSANZ released a public consultation paper seeking stakeholder views and available evidence relating to the qualifying criteria for nutrition content claims about dietary fibre. FSANZ concluded the review and advised the outcomes in November 2013, effectively shortening the 3 year transition period for dietary fibre claims by 11 months.

The AFGC is proposing this change to reinstate the full three year transition period for dietary fibre nutrition content claims as has been permitted for all other nutrition content claims. The AFGC is not aware of any policy rationale to suggest that companies making fibre claims should have less time than companies making other nutrition content claims in which to comply with the new Standard 1.2.7 requirements.

This application, invited by FSANZ, therefore seeks to bring the transition period for dietary fibre in line with the transition period allowed for the remainder of Standard 1.2.7. It will provide industry with an adequate period of time to in which to address the challenges and financial impacts resulting from the increased levels of dietary fibre required.

#### Technical Challenges

Increasing the dietary fibre content of food products provides technical challenges to industry - shelf stability, texture, shape and appearance of products can all be altered by increased fibre content. Increasing fibre can also result in a decrease in whole grain content of foods as lower fibre whole grains may be replaced with non-cereal sources of fibre.

The end result of addressing these challenges may be a reduction in the fibre content of foods - manufacturers may decide that the higher levels are not achievable without significant impacts to the quality of the product, and may choose to remove fibre from existing products.

#### Cost impact to industry

AFGC considers that there are financial impacts to industry with increasing the cereal fibre content of foods to meet the qualifying criteria in Standard 1.2.7.

The costs to industry include:

- Changes to packaging to remove or change current claims for products that no longer meet the requirements for a particular dietary fibre claim;

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<sup>5</sup> Communication from [REDACTED], CEO FSANZ to [REDACTED], CE AFGC, 31.03.14

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- Cost to reformulate products to meet higher qualifying criteria – these costs are required to maintain “status quo”, i.e., the current level of claim and will therefore not result in increased sales to offset the cost of reformulation.
- Impact on consumer confidence/ trust in a company/ brand/ product.

Consumer will not necessarily understand the change is to the regulation rather than to a product. Consumers may feel they have been misled to date in relation to the dietary fibre claims.

### 3.3. Advantages of the Proposed Change

*(As per Section 3.1.4(b) of the Application Handbook 1 September 2013)*

The proposed change will provide industry with an adequate transition period within which to make the necessary changes to comply with the increased dietary fibre levels required under Schedule 1 of Standard 1.2.7.

Information provided to the AFGC by member companies indicates a range of 10 -100% foods and SKUs making claims do not meet the relevant qualifying criteria.

These figures represents the number of products carrying nutrition content claims about dietary fibre that do not meet the qualifying criteria in Standard 1.2.7 as a percentage of the total number of products carrying nutrition content claims about dietary fibre.

### 3.4. Disadvantages of the Proposed Change

The AFGC has not identified any disadvantages for the proposed change.

Products making dietary fibre claims are currently required to be labelled to indicate the level of dietary fibre so consumers will be informed as to the level of dietary fibre present in the product.

## 4. REGULATORY IMPACT INFORMATION

*(As per section 3.1.4 A of the Application Handbook 1 September 2013)*

### 4.1. Costs and Benefits – Consumer

The revised effective date for the changes to dietary fibre claims is unlikely to have any significant impact on consumers. It may provide a benefit in that companies will have longer to phase in the changes with the potential for less impact to current products. For example, the additional time may allow a company to consider reformulating a product to meet the increased fibre claim threshold, resulting in some products maintaining claims rather than claims being “downgraded” and causing consumer confusion. Alternatively, companies will have more time to communicate product changes to consumers thereby reducing the potential for confusion.

The proposed amendment places no additional economic burden on consumers as dietary fibre will be labelled and consumers can choose if they wish to purchase a product containing dietary fibre and assess the level of dietary fibre available by reviewing the nutrition information panel (NIP).

#### **4.2. Costs and Benefits - Industry and Business**

The proposed amendment benefits industry in allowing the full 3 year transition period in which to implement changes to products and packaging rather than the current 2 year period which has resulted from the consultation conducted during the actual transition period.

The proposed amendment places no additional economic cost on business.

#### **4.3. Costs and Benefits – Government**

The proposed amendment places no additional regulatory costs on government beyond the initial regulatory cost of approving the application and amending the Code.

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### **4.4. Impact on International Trade**

The AFGC notes that, in developing food standards, FSANZ must have regard to its WTO obligations; the promotion of consistency between domestic and international food standards; and the promotion of fair trading in food. These matters encompass consideration of international standards and trade issues.

Products currently manufactured in other markets will continue to be permitted to be imported into Australia and New Zealand for a further 12 months allowing time for the required changes to be implemented to dietary fibre levels and claims which will reduce potential barriers to entry for these products.

## **5. INFORMATION TO SUPPORT THE APPLICATION**

*(As per section 3.1.5 of the Application Handbook 1 September 2013)*

### **5.1. Data Requirements**

This requirement does not apply to this application.

### **5.2. FSANZ Act Objectives**

Information is provided in this application to enable the objectives specified in Section 18 of the FSANZ Act to be addressed as follows:

- (a) The protection of public health and safety.

This application does not present any public health and safety issues.

- (b) The provision of adequate information relating to food to enable consumers to make informed choices and (c) the prevention of misleading or deceptive conduct.

Food products will be labelled and consumers can choose if they wish to purchase a product containing dietary fibre and assess the level of dietary fibre available by reviewing the nutrition information panel (NIP).

### **5.3. Public Health and Safety Issues**

This application does not present any public health and safety issues.

### **5.4. Consumer Choice**

This application does not present any consumer choice issues – food products will be labelled and consumers can choose if they wish to purchase a product containing dietary fibre and assess the level of dietary fibre available by reviewing the nutrition information panel (NIP).

### **5.5. Support for the Proposed Change**

The AFGC has the support of the following of the following organisations in relation to this application:

- Grains and Legumes Nutrition Council
- New Zealand Food & Grocery Council

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- Food and Beverage Importers Association

### 5.6. Policy Guidelines

(As per section 3.5.2 of the Application Handbook 1 September 2013)

Information is provided in this application to address the relevant principles in the Policy Guideline on Nutrition, Health and Related Claims<sup>6</sup>.

The policy principles endorsed by Australian New Zealand Food Regulation Ministerial Council (ANZFRMC) for nutrition, health and related claims for food provide that any intervention by government should:

Policy Principles	Section of Application
1. give priority to protecting and improving the health of the population	N/A
2. enable the responsible use of scientifically valid nutrient, health and related claims;	N/A
3. support government, community and industry initiatives that promote healthy food choices by the population;	N/A
4. be consistent with and complement Australian and New Zealand national policies and legislation including those relating to nutrition and health promotion, fair trading, industry growth and international trade and innovation;	N/A
5. be cost effective overall, not more trade restrictive than necessary and comply with Australia's and New Zealand's obligations under the WTO Agreements;	Section 4
6. contain a process of substantiation which aligns levels of scientific evidence with the level of claims along the theoretical continuum of claims, and at minimum costs to the community;	N/A
7. draw on the best elements of international regulatory systems for nutrient, health and related claims and be responsive to future trends and developments;	N/A
8. provide for collaborative action among enforcement agencies, industry and consumers to optimise educational resources; and	N/A
9. allow for effective monitoring and appropriate enforcement.	N/A

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<sup>6</sup> <http://www.foodstandards.gov.au/code/fofr/fofrpolicy/Documents/Revised%20Health%20Claims%20Policy%20Guideline%201%20July%2004.pdf>, accessed 13.06.14

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The following features of any regulatory system for health, nutrition and related claims are also considered desirable. The system should:

Policy Principles	Section of Application
10. favour pre-market approval rather than post-market reaction;	N/A
11. enable better engagement of sectors other than government in providing nutritional advice and information;	N/A
12. promote a partnership between consumers, governments and industry in the delivery and responsible use of nutrition, health and related claims which protects consumers from false and misleading information that may result in distorted diets which harm health and increase health inequalities; and	N/A
13. allow for all transition issues to be clearly identified and steps taken to justify and to minimise costs of change and transition.	Sections 3.2 and 4

Policy principle 13 is particularly relevant in the context of this application which is proposed in order to “minimise costs of change and transition”.



## 6. GENERAL FOOD LABELLING

(As per section 3.2.1 of the Application Handbook 1 September 2013)

### 6.1. General information to support the proposed labelling change

(As per section 3.2.1A of the Application Handbook 1 September 2013)

#### Description of the proposed labelling change

The AFGC is requesting additions to columns 2 and 4 of Schedule 1 for Dietary Fibre as set out in Table 1 below.

The proposed change will not change any labelling requirements for dietary fibre claims but rather delay the requirement to comply with the higher dietary fibre levels required under Standard 1.2.7.

**Table 1:** Proposed amendment to Schedule 1 of Standard 1.2.7

Column 1	Column 2	Column 3	Column 4
Property of food	General claim conditions that must be met	Specific descriptor	Conditions that must be met if using specific descriptor in column 3
Dietary fibre	<p>A serving of the food contains at least 1.5 g of dietary fibre unless the claim is about low or reduced dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 2 g of dietary fibre unless the claim is about low or reduced dietary fibre.</p>	Good source	<p>A serving of the food contains at least 3 g of dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 4 g of dietary fibre.</p>
		Excellent source	<p>A serving of the food contains at least 6 g of dietary fibre.</p> <p>Effective from 18 January 2017: A serving of the food contains at least 7 g of dietary fibre.</p>
		Increased	<p>(a) the reference food contains at least 1.5 g of dietary fibre per serving;</p> <p>Effective from 18 January 2017: (a) the reference food contains at least 2 g of dietary fibre per serving; and (b) the food contains at least 25% more dietary fibre than in the same quantity of reference food.</p>



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### **Foods and/or food groups likely to be affected by the proposed change**

The specific foods or food categories affected by the proposed change will not change from those that are already required to make the change to accommodate the higher levels of dietary fibre required.

### **6.2. Information related to the potential impact on consumer understanding and behaviour**

*(As per section 3.2.1B of the Application Handbook 1 September 2013)*

#### **Information to demonstrate consumer support of the proposed labelling change**

The AFGC does not consider this information to be required as a labelling change is not being proposed.

#### **Information to demonstrate that the proposed labelling change will be understood and will assist consumers**

The AFGC does not consider this information to be required as a labelling change is not being proposed.

#### **Information to demonstrate that the proposed labelling change will not have any adverse health or diet impacts on any population groups (e.g. age or cultural groups)**

The AFGC does not consider this information to be required as a labelling change is not being proposed.

## 7. NUTRITION CONTENT AND HEALTH CLAIMS

*(As per section 3.2.6 of the Application Handbook 1 September 2013)*

### **7.1. Information related to nutrition content claims in Schedule 1 of Standard 1.2.7**

*(As per section 3.2.6 Part 1: A of the Application Handbook 1 September 2013)*

#### **Justification for any proposed change**

The AFGC has provided the justification for the proposed change under Section 3 of this application.

**Consideration of the following in relation to any proposed changes to the claim** conditions related to the property of food and each descriptor:

- (i) the nutrient composition of foods likely to carry the nutrition content claim as described in response to A.2 in Section 3.2.1 of the Application Handbook
- (ii) any relevant reference values pertaining to the property of food
- (iii) whether the conditions are achievable in the Australian and New Zealand food supply.

The AFGC considers this is not applicable to this application.

## CHECKLISTS

(As per section 3.1.11 of the Application Handbook 1 September 2013)

General requirements (3.1)			
<input type="checkbox"/>	<b>3.1.1 Form of application</b>  <input type="checkbox"/> <i>Application, abstracts and other key documents in English</i>  <input type="checkbox"/> <i>Executive Summary (separated from main application electronically and in hard copy)</i>  <input type="checkbox"/> <i>Relevant sections of Part 3 clearly identified</i>  <input type="checkbox"/> <i>Pages sequentially numbered</i>  <input type="checkbox"/> <i>Electronic copy (searchable)</i>  <input type="checkbox"/> <i>1 hard copy</i>  <input type="checkbox"/> <i>Electronic and hard copy identical</i>  <input type="checkbox"/> <i>Hard copy capable of being laid flat</i>  <input type="checkbox"/> <i>All references provided (in electronic and hard copy)</i>	<input type="checkbox"/>	<b>3.1.6 Assessment procedure</b>  <input type="checkbox"/> <b>General</b>  <input type="checkbox"/> <i>Major</i>  <input type="checkbox"/> <i>Minor</i>  <input type="checkbox"/> <i>High level health claim variation</i>
		N/A	<b>3.1.7 Confidential Commercial Information</b>  <input type="checkbox"/> <i>Confidential material separated in both electronic and hard copy</i>  <input type="checkbox"/> <i>Formal request including reasons</i>  <input type="checkbox"/> <i>Non-confidential summary provided</i>
<input type="checkbox"/>	<b>3.1.2 Applicant details</b>	N/A	<b>3.1.8 Exclusive Capturable Commercial Benefit</b>  <input type="checkbox"/> <i>Justification provided</i>
<input type="checkbox"/>	<b>3.1.3 Purpose of the application</b>	N/A	<b>3.1.9 International and other national standards</b>  <input type="checkbox"/> <i>International standards</i>  <input type="checkbox"/> <i>Other national standards</i>
<input type="checkbox"/>	<b>3.1.4 Justification for the application</b>  <input type="checkbox"/> <i>Regulatory impact information</i>  <input type="checkbox"/> <i>Impact on international trade</i>	<input type="checkbox"/>	<b>3.1.10 Statutory Declaration</b>

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N/A	3.1.5 Information to support the application  <input type="checkbox"/> <i>Data requirements</i>	x <input type="checkbox"/>	3.1.11 Checklist/s provided with application  x <input type="checkbox"/> <i>3.1 Checklist</i>  x <input type="checkbox"/> <i>Any other relevant checklists for Parts 3.2-3.7</i>
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General food labelling (3.2.1)			
x <input type="checkbox"/>	A.1 Proposed labelling change	N/A	B.2 Proposed labelling to be understood and assist consumers
x <input type="checkbox"/>	A.2 Foods or food groups potentially affected	N/A	B.3 Any adverse health or diet impacts
N/A	B.1 Demonstrated consumer support for change		
Nutrition content and health claims (3.2.6)			
1. Amendments to Standard 1.2.7, other than adding new food-health relationships to Schedules 2 and 3  <b>N/A</b>			
<input type="checkbox"/>	A. Nutrition content claims	<input type="checkbox"/>	C. Amendment to nutrient profiling scoring criterion or method
<input type="checkbox"/>	B. Amendment to existing high level or general level claim	<input type="checkbox"/>	D. Variation of required elements of systematic review in Schedule 6

# Australian Food and Grocery Council

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