



P1038: Vitamin and mineral claims, and sodium claims about foods containing alcohol

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The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on P1038: Vitamin and mineral claims, and sodium claims about foods containing alcohol by the Food Standards Australia and New Zealand (FSANZ).

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DAA interest in this consultation

DAA advocates for a safe and nutritious food supply in which the community has confidence, and which meets the nutritional needs of groups with special needs.

As experts in nutrition, Accredited Practising Dietitians (APDs) assist individuals with special needs and the population with the translation of food labels and nutrition content claims. APDs also provide nutritional expertise relating to the development of food products that must comply with the current regulatory framework.

Recommendations

1. Vitamin and mineral claims prescribed reference quantity proposal

DAA supports the proposed amendment to the general claims conditions in Standard 1.2.7 – Nutrition, Health and Related Claims in the Australia New Zealand Food Standards Code to permit claims about vitamin and mineral content to be based on the prescribed reference quantity, but only where the maximum claimable amount (Standard 1.3.2) is less than the minimum amount required to make a claim (due to the serving size specified by the food supplier).

DAA understands the proposed amendment would not apply to other vitamin and mineral content claims (including on the same food), where the maximum claimable amount is more than the minimum amount required to make a claim i.e. for these claims, the minimum amount required to make the claim would remain on a per serving basis.

2. Sodium claims on foods containing alcohol

DAA supports the proposed amendment to allow foods (not beverages) which contain more than 1.15% alcohol by volume to make sodium claims under standard 1.2.7.

Discussion

1. Vitamin and mineral claims prescribed reference quantity proposal

DAA recognises the need for food industry and the general public to have access to accurate information on food labels to assist them to make informed food choices.

DAA supports the proposed amendment to the Code to permit 'source' or 'contains' type claims about vitamin and mineral content in foods fortified with vitamins or minerals, to be based on the prescribed reference quantity, but only where the maximum claimable amount (Standard 1.3.2) is less than the minimum amount required to make a claim (due to the serving size specified by the food supplier) for the reasons outlined below:

- without such amendment to the Code there will be a discrepancy in conditions for vitamin and mineral content claims about foods fortified with vitamins and minerals,

between Standards 1.2.7 (Health, Nutrition and Related Claims) and 1.3.2 (Vitamins and Minerals). This means it will be impossible for some vitamin and mineral claims to meet the minimum amount required to make a nutrition content claim (Standard 1.2.7) and not exceed the maximum claimable amount (Standard 1.3.2).

- It avoids the need to amend provisions relating to maximum claimable amounts established according to principles in the Ministerial Policy Guideline: *Fortification of food with vitamins and minerals*. Hence, the proposed amendment is not expected to impact on the protection of public health and safety.
- It benefits suppliers of certain fortified foods as they will continue to be able to communicate vitamin and mineral content where their product serve size is smaller than the reference quantity prescribed in the Code. Increasing the serving size in order to meet claim requirements is not always appropriate or may not meet the needs of consumers.
- It enables consumers to continue to make informed choices about the vitamin and mineral content of certain fortified foods where the serve size is smaller than the reference quantities prescribed in Standard 1.3.2.

2. Sodium claims on foods containing alcohol

DAA supports the proposed amendment to allow foods (not beverages) which contain more than 1.15% alcohol by volume to make sodium claims as:

- Some foods containing alcohol in relatively small quantities, such as soy sauces, can be significant contributors of salt to the diet.
- Consumers can identify lower-sodium versions for current labels and the proposal would allow these labelling claims to be continued.