



Targeted engagement on fats and oils labelling

April 2018

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 6000 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 the targeted engagement on fats and oils labelling by the Food Regulation Standing Committee.

Position:	Practice Support Dietitian
Organisation:	Dietitians Association of Australia
Address:	1/8 Phipps Close, Deakin ACT 2600
Telephone:	02 6189 1203
Facsimile:	02 6282 9888
Email:	practicesupport@daa.asn.au.au

DAA interest in this consultation

DAA is the peak professional body for dietitians in Australia and responsible for the Accredited Practising Dietitian (APD) program as the basis for self-regulation of the profession.

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

As experts in nutrition, APDs assist the general population and groups with special dietary requirements to meet their nutritional needs. APDs also assist with the translation of food labels and nutrition content claims.

Recommendations

- DAA supports and advocates for increased transparency in fats and oils labelling so consumers are able to make informed choices in support of dietary guidelines.
- With the information currently available, DAA supports various options for labelling of fats and oils in the ingredients list including:
 1. Use of the term ‘added fats’ to be used in the ingredient list as the generic term, followed by a bracketed list, e.g. added fats (palm oil, milk fat).
 2. Mandatory identification of fat and oil by type, i.e. similar to the United States (US) system where each individual fat and oil (of animal or vegetable origin) is required to be declared by its specific common or usual name (e.g. ‘beef fat’, ‘cottonseed oil’)
- DAA recommends that the opportunity to mandate inclusion of trans fats on the nutrition information panel (NIP) should be re-visited.

Discussion

1. Do the current labelling requirements provide adequate information for consumers to be able to make informed choices in support of dietary guidelines? Please provide information to support your response.

DAA recognises that the current fats and oils labelling requirements **do not** provide adequate information for consumers to be able to make informed choices in support of current dietary guidelines. DAA supports more transparent fats and oils labelling requirements which provide more information for consumers to be

able to make informed choices in support of dietary guidelines, as set out in the recommendations above.

Both current sets of Australian¹ and New Zealand² dietary guidelines promote limiting intake of foods containing saturated fats. In both countries, the recommended intake for saturated fat and trans fats together is less than 10 percent of total energy (i.e. less than 24g/day based on the daily energy intake for the average adult diet of 8700kJ).^{1,2}

These guidelines are based on the established evidence:

1. “Saturated fat is the strongest dietary determinant of plasma LDL concentration
2. Replacing saturated fat with polyunsaturated and monounsaturated fats is associated with improved blood lipids related to cardiovascular disease.”^{1(p69)}

However, in Australia and New Zealand saturated and trans fat combined contributes to 12% and 13% respectively of overall energy intake.^{3,4} (*Approximately 28g and 31g/day respectively based on the daily energy intake for the average adult diet of 8700kJ*).

DAA also supports the recommendations in the Australian Dietary Guidelines (ADGs) (Appendix G) to choose foods and dietary patterns, in line with the guidelines, that support environmental sustainability.¹ The current use of the generic term ‘vegetable oil’ in the ingredients list, without explicit identification by type is of concern. DAA recommends that nutritionally and environmentally unfavourable oils (such as coconut and palm oil or fats of animal origin) should be easily identifiable and accessible to consumers on food labels. This would be of benefit for the dual public health purposes of informed consumer decision making in support of dietary guidelines, and to drive product reformulation, however also recognising the complexity of the latter. DAA highlights that the FSANZ Supporting Document 2⁵ associated with the technical evaluation for labelling review recommendation 12⁶ shows that the US, the European Union and Canada have more transparent labelling requirements (relative to Australian and New Zealand) involving the identification of fat and oil types in ingredients lists.

DAA supports that consumers have the right to know what type of oil or fat are in food products they consume, to make informed choices in support of current dietary guidelines. Consumers should not have to attempt to make educated guesses based on the saturated fat content in the NIP. This can be challenging, if not impossible, for food products involving varying amounts of ingredients with varying fat profiles. DAA supports all fats and oils being identified in the NIP and specifically named in the ingredients list, which would support consumer education around types and sources of fats.

2. What views do consumers have on the health impacts of different fats and oils, and to what extent do these views align with the advice in the dietary guidelines? Please provide any evidence you have in support of your response.

In addition to the information provided within the FSANZ Support Document 4⁷ of the technical evaluation for labelling review recommendation 12,⁶ research undertaken on the impact of consumer confusion on nutrition literacy and dietary behaviour indicated that most participants of the study did respond to health communications (such as dietary guidelines) by striving to eat healthily.⁸ However, the study showed consumer efforts can be hindered by inadequate nutrition information derived from unreliable sources, flawed baseline nutrition knowledge, and poor nutrition literacy.⁸

DAA considers that misinformation is contributing to consumers holding views around the health impacts of fats and oils that do not align with the advice in the national dietary guidelines, however is unaware of research exploring the extent of this issue. DAA is aware of significant misinformation around fats and oils in the media and has been involved with addressing some of these directly (see the [Challenging Misinformation](#) section of the DAA website).⁹

DAA acknowledges that at least some consumer awareness has been demonstrated in regards to the negative health impacts of palm oil. DAA highlights the results of a 2015 CHOICE survey (included in the technical evaluation for labelling review recommendation 12) which showed that of the Australians surveyed who placed importance of being able to correctly identify whether a product contains palm oil, 58% cited health reasons.⁶

3. Do you think consumers understand the nutritional profile of various fats and oils and are food labels able to assist in that understanding? If so, please explain and provide any evidence you have in support of your response.

DAA acknowledges the 2005 qualitative Australian study by Chan et al. within the FSANZ technical evaluation and supporting documents which found participants viewed vegetable oils, fish oils and unsaturated fats as “good fats” and viewed saturated and animal fats as “bad fats”.⁷ Additionally, the results of a 2015 CHOICE survey indicated consumer confusion surrounding vegetable versus palm oil, with only 15% of 1061 adults surveyed identifying that palm oil was included in the term ‘vegetable oil.’¹⁰ Given this confusion, even if consumers are aware of the health impacts of palm oil, it is unlikely that they will be able to make choices in line with the dietary guidelines under the current labelling of fats and oils.

DAA supports the commentary under section 4.8.1 of the FSANZ Technical Evaluation Report,² and particularly reinforces that if palm and coconut oils were required to be specified in the ingredient list, this would be used to educate

consumers about the contribution to saturated fat content, and in regards to the dietary guidelines.²

4. Do consumers consider information on fats (such as the nutritional profile or source) when making purchasing decisions? Please justify your response and provide any evidence you have in support of your response.

DAA are aware of and acknowledge the results of a survey by the Orangutan Alliance which showed one of the top five concerns of grocery buyers when it comes to the products they purchase was the presence of palm oil.¹¹ However, DAA have not been able to access the original survey and thus cannot speak to the quality or comment further on this survey.

DAA members who regularly interact with the public recognise that in terms of the source of fat, consumers are increasingly interested in the presence of palm oil in their food when making purchasing decisions, however are not aware of further research regarding this. As discussed in response to question 1, DAA supports the ADGs recommendations to choose foods and dietary patterns that support environmental sustainability.¹

5. Are there any references, either nutrition, technical or consumer related, that we should consider when examining the evidence to inform whether there is a policy issue with fats and oils labelling and if so, what are those?

DAA suggests that the following two references be considered when examining the evidence:

1. Heart Foundation. Dietary Fat and Heart Healthy Eating – Position Statement. Heart Foundation; n.d.¹²
2. Wu J, Downs S, Catterall E, et al. Levels of trans fats in the food supply and population consumption in Australia: an Expert Commentary rapid review. The Sax Institute; 2017.¹³

6. Do you have any other comments you wish to make on the labelling of fats and oils that have not already been covered in your comments to the questions above?

DAA recommends that the opportunity to mandate inclusion of trans fats on the NIP should be re-visited. While DAA notes the outcome of the previous inquiry into recommendation 13,¹⁴ DAA advocates for labelling which provides transparency on the presence of industrially-produced trans fat in packaged food products, and reducing these in the Australian food supply.

References

1. National Health and Medical Research Council. Australian Dietary Guidelines. Canberra: National Health and Medical Research Council. 2013.
2. Ministry of Health. Eating and Activity Guidelines for New Zealand Adults. Wellington: Ministry of Health. 2015.
3. Australian Bureau of Statistics. Australian Health Survey: Nutrition First Results - Foods and Nutrients, 2011-12, cat. no. 4364.0.55.007. Canberra: ABS. 2014.
4. University of Otago and Ministry of Health. A Focus on Nutrition: Key findings of the 2008/09 New Zealand Adult Nutrition Survey. Wellington, New Zealand. 2011.
5. FSANZ. Supporting document 2 – current and proposed international labelling requirements for sugars, fats and oils – Labelling Review Recommendation 12. FSANZ. 2016.
6. FSANZ. Technical Evaluation for Labelling Review Recommendation 12 – Ingredient labelling of added sugars, added fats and added vegetable oils. FSANZ. 2016
7. Supporting document 4 – Rapid evidence assessment on consumer knowledge, attitudes, and behaviours relating to sugars, fats and oils in the ingredient list – Labelling Review Recommendation 12. FSANZ. 2016
8. Cornish L, Moraes C. The impact of consumer confusion on nutrition literacy and subsequent dietary behaviour. *Psychology & Marketing*. 2015; 32(5): 558-572
9. Dietitians Association of Australia. Challenging Misinformation. [Internet], n.d. Available from: <https://daa.asn.au/voice-of-daa/challenging-misinformation/>
10. CHOICE. Are we being palmed off? [Internet], 2015. Available from: <https://www.choice.com.au/food-and-drink/nutrition/food-labelling/articles/palm-oil-labelling#survey>
11. Australian Food News. New palm oil free certification program launched in Melbourne. [Internet], 2017. Available from: <http://www.ausfoodnews.com.au/2017/09/18/new-palm-oil-free-certification-program-launched-in-melbourne.html>
12. Heart Foundation. Dietary Fat and Heart Healthy Eating – Position Statement. Heart Foundation; n.d. (Available from: https://www.heartfoundation.org.au/images/uploads/main/For_professionals/Dietary_Fats_Position_Statement_2017.pdf).
13. Wu J, Downs S, Catterall E, et al. Levels of trans fats in the food supply and population consumption in Australia: an Expert Commentary rapid review. The Sax Institute; 2017.
14. FSANZ. Technical evaluation for recommendation 13 (trans fatty acids). FSANZ. 2017.