

Response ID ANON-V5ES-G4PA-F

Submitted to **Public Consultation: Labelling of sugars on packaged foods & drinks**
Submitted on **2018-09-19 08:27:28**

Submitter details

Privacy and confidential information and permissions

No

If you want all or parts of this submission to be confidential, please state why.:

Submitter information

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Yes

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Sector:

Public health

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If we require further information in relation to this submission, can we contact you?:

Yes

Have you read the Consultation Regulation Impact Statement?

Have you read the Public Consultation Regulation Impact Statement: Labelling of sugars on packaged foods and drinks? (Please click on the link above to open the document)

Yes

Survey Questions 1-4

1 Do you support the statement of the problem: "Information about sugar provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines"?

Yes

If you do not support this statement, please justify why not with your reasons.:

If you would like to provide an alternate problem definition, please enter it below and justify your statement with evidence:

Please attach references here:

No file was uploaded

Not Answered

2 Are you aware of any form of information about added sugars that is provided on food labels in addition to those identified in section 1.6 of the Consultation paper?

No

If yes, please provide details here and justify with evidence.:

Please attach references.:

No file was uploaded

Not Answered

3 Are you aware of other sources of information (publically available or otherwise) on the added sugars content of foods available in Australia and New Zealand beside those described in section 1.8 of the Consultation paper?

No

If yes, please provide details here and justify with evidence.:

Please attach references. :

No file was uploaded

Not Answered

4 Do you agree with the desired outcome of this work: "Food labels provide adequate contextual information about sugars to enable consumers to make informed choices in support of the dietary guidelines"?

Yes

If no, please suggest an alternate desired outcome and justify your suggestion.:

Please attach references here:

No file was uploaded

Not Answered

Option 2: Education on how to read and interpret labelling information about sugars

5 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome? :

Effective in combination with another option (please specify below)

Please provide evidence to justify your views. :

- "Thinking about any field in education the first thought that comes to mind is 'what knowledge do we want to teach?' Yet for education about food, knowledge alone is not enough". The impact of using an education approach will be limited. By incorporating various different options there will be a stronger, well rounded approach. (Sumner, 2016)
- "The increasing demands on individuals to take responsibility for their own health seems to inadvertently increase social inequalities in health as it favours those with high health literacy and education levels." Education alone will increase inequities as it favours those with higher levels of health literacy (Bo et al, 2014).

References:

Sumner, J. (2016), Food, and sustainability: Sites for resistance and change. Learning doi:10.1057/978-1-137-53904-5

Bo, A., et al. (2014). National indicators of health literacy: ability to understand health information and to engage actively with healthcare providers - a population-based survey among Danish adults. BMC Public Health, 14(1). doi:10.1186/1471-2458-14-1095

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Yes

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Yes

Please describe what these are?:

Using education alone will increase inequities as it favours those with higher levels of health literacy.

Please attach references here:

No file was uploaded

Not Answered

6 Impacts

How would this option impact you?:

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your views.:

Please attach evidence to justify your views. :

No file was uploaded

Not Answered

Option 3: Change to statement of ingredients

7 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome?:

Effective in combination with another option (please specify below)

Please provide evidence to justify your views. :

• Consumer understanding of the nutrition information panel and how to interpret this information is limited (Ni Mhuechu & Gorton, 2007). By only changing the statement of ingredients there would be minimal impact on overall consumer choice and our populations' health. Consumers who do read nutrition information panels are most likely people with better health, and a high health literacy. This option alone may increase inequities as the health literacy needed to interpret a nutrition information panel is high, and the communities most in need have lower health literacy levels (Malloy-Weir & Cooper, 2016). However used in combination with the other options, particularly option six (pictorial front of pack display) it has the potential to be more effective.

• A bracketed list of all sugars would be more effective than asterisked or emboldened sugar-based ingredients. This will:

o Likely move 'sugar' higher up in the ingredients list on products with multiple sources of sugars.

o Minimise confusion on what is and what is not an added sugar.

o Reduce confusion on the overall amount of added sugar in products.

• If the added sugars were emboldened consumers may still not identify these as sugars. Currently on the ingredient list allergens such as milk, peanuts, shellfish are emboldened. Having added sugar emboldened too may cause consumer confusion.

References:

Malloy-Weir L & Cooper M (2016). Health literacy, literacy, numeracy and nutrition label understanding and use: a scoping review of the literature, *Journal of Human Nutrition and Dietetics*.

<https://onlinelibrary.wiley.com/doi/abs/10.1111/jhn.12428>

Ni Mhurchu C, Gorton, D (2007). Nutrition labels and claims in New Zealand and Australia: a review of use and understanding. *Australian and New Zealand Journal of Public Health*, 31(2). <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1753-6405.2007.00026.x>

Soederberg-Miller & Cassady, (2015). The effects of nutrition knowledge on food label use. A review of the literature, *Appetite*.

<https://www.sciencedirect.com/science/article/pii/S0195666315002743>

Becker et al (2015). Front of pack labels enhance attention to nutrition information in novel and commercial brands, *Food Policy*, Volume 56, October 2015, P. 76-86. <https://www.sciencedirect.com/science/article/pii/S0306919215001001>

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Yes

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Yes

Please describe what these are?:

An added weakness for option 3 is that the outcome is still limited by levels of health literacy and numeracy. There will be the same unintended consequence of increasing inequities if this is the only action taken.

Please attach references here:

No file was uploaded

Not Answered

8 Impacts

How would this option impact you?:

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your view.:

Please attach references here :

No file was uploaded

Not Answered

9 Implementation mechanism

Referring to Table 1 in section 3 in the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Regulatory

Please provide the pros and cons of your selected implementation mechanism, using evidence to justify your view.:

- It is known that voluntary implementation would not be picked up by all manufacturers. This may cause confusion if sugars are labelled differently on different products. Consumers may assume that a label without the sugars grouped has less sugar due to sugar being further down the list of ingredients. If this change was regulatory it would be easier for consumers to compare products.
- Consistency is essential for success with any of the suggested options. Without regulation, there will be no consistency.

Please attach references here :

No file was uploaded

Not Answered

Option 4: Added sugars quantified in the NIP

10 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome? :

Effective in combination with another option (please specify below)

Please provide evidence to justify your views. :

- Of the two possible approaches, "Added sugars quantified in the Nutrition Information Panel (NIP) and enhanced with additional contextual information" would be more effective. High/Medium/Low messaging is the more favourable choice.
- People with low literacy and numeracy skills find it difficult to interpret nutrition labels, even consumers with high literacy and numeracy can find it difficult to interpret labels. Therefore, having High/Medium/Low next to the added sugar on the NIP would mean there was less interpretation for the consumer.
- In reference to the consultation document, page 23, paragraph 5 "International consumer research also reports that consumers are not able to use abstract information such as grams of sugars listed on a label to evaluate whether a food is high or low in sugars, and that additional contextual information can assist consumers to make more accurate judgements about a food's sugar content".
- Could be effective in combination with two, three, five and six. With six being the most favourable.
- The voluntary Health Star Ratings on food labels has seen reformulation of some products to get a higher health star rating. Having added sugars separated on the NIP may see reformulation of some food products to have lower levels of added sugars. If many products reduce their sugar levels then the amount of sugar consumed for the population will decrease. This will have a significant impact on the health of the population, even for consumers who do not read and interpret the NIP.

References:

Ni Mhurchu C et al (2017), Effects of a Voluntary Front-of-Pack Nutrition Labelling System on Packaged Food Reformulation: The Health Star Rating System in New Zealand, *Nutrients* 2017, 9(8), 918; doi:10.3390/nu9080918. <http://www.mdpi.com/2072-6643/9/8/918/htm>

Rothman R L et al (2006), Patient Understanding of Food Labels: The Role of Literacy and Numeracy, *American Journal of Preventive Medicine*, Volume 31, Issue 5, November 2006, P. 391-398. <https://www.sciencedirect.com/science/article/pii/S0749379706002819>

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Yes

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Yes

Please describe what these are?:

Added strength – having High/Medium/Low added sugars in the NIP is likely to set the precedent for categorisation of other negative nutrients associated with health impacts (sodium and saturated fat) in the future of food and beverage labelling.

Please attach references here:

No file was uploaded

Not Answered

11 Impacts

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your view.:

Please attach references here :

No file was uploaded

Not Answered

12 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)?:

Would adopting this option require another element of a food label to be removed from the package?:

No

If so, which labelling element/s would be removed?:

Please provide evidence to justify your response. :

No – The NIP is on the back of the products, all above labelling elements listed would be on the front of pack.

Please attach references here:

No file was uploaded

Not Answered

13 Implementation mechanism

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option:

Regulatory

Please provide further comments here:

Please attach references here:

No file was uploaded

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

Consistency is essential for success with any of the suggested options. Without regulation, there will be no national consistency.

Please attach references here:

No file was uploaded

Not Answered

Option 5: Advisory labels for foods high in added sugars

14 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome? :

Effective in combination with another option (please specify below)

Please provide evidence to justify your views. :

- An advisory label is easier for consumers to interpret. If it is on the front of the pack it will be visible to all shoppers. If situated on the back of the pack it will be less effective as products on supermarket shelves have the front of pack facing outwards. Situating the label on the front of the pack will require no extra effort from the consumer to find the advisory label
- An advisory label will be an easy visual for foods high in sugar. However, it will not show foods with a medium level of added sugar, of which consumers may eat high volumes. Therefore consumers may assume that a food without an advisory label is low in sugar, whereas it may be medium in sugar.
- Implementation of the advisory label will need to ensure consistent labelling, either using amount of added sugar per 100g or per serve. Caution will need to be taken if using per serve as food industry could lower the serving size of a product to ensure that it does not receive an advisory label, where as consumers may eat well over the suggested serving size.
- In combination with option six, foods 'high in added sugar' will be alerted as well as 'any added sugar' in foods. This will allow consumers to make more informed decisions, and to see how many teaspoons are considered as high sugar. This will help the interpretation of the option six label, and would show foods that are borderline high added sugar, through visual representation and the comparing of different food products. For example, if a product with 5 teaspoons of sugar has an advisory label and a product with 4 teaspoons does not, the consumer will be able to infer that the 4 teaspoon product is borderline 'high sugar'.

References:

Becker M W et al (2015), Front of pack labels enhance attention to nutrition information in novel and commercial brands, Food Policy, Volume 56, October 2015,

Pages 76-86.

<https://www.sciencedirect.com/science/article/pii/S0306919215001001>

Talati Z et al (2017), The relative ability of different front-of-pack labels to assist consumers discriminate between healthy, moderately healthy, and unhealthy foods, *Food Quality and Preference*. Volume 59, July 2017, P. 109-113.

<https://www.sciencedirect.com/science/article/abs/pii/S0950329317300502>

Talati Z et al (2016), Consumers' responses to front-of-pack labels that vary by interpretive content, *Appetite* Volume 101, 1 June 2016, Pages 205-213.

<https://www.sciencedirect.com/science/article/pii/S0195666316300988>

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Yes

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Please describe what these are?:

Depending on the threshold that is determined, there are a higher number of strengths than weaknesses.

Please attach references here:

No file was uploaded

Not Answered

15 Impact

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

16 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)?:

- Potential for limited or lack of space available on food labels. This would suggest other labels would need to be removed.
- In order for this label to be beneficial it would need to be mandatory (and regulated). Therefore leaving the option of removing voluntary labels (e.g. Health Star Rating, % Daily Intake etc.)
- In our practice we have seen that there are clear inconsistencies with voluntary labelling. For example, the health star rating is on some products, but not all products. It is important that consistency is shown throughout the food environment to minimise confusion by the consumer (Roberto & Khandpur, 2014).

Reference:

Roberto, C. A., & Khandpur, N. (2014). Improving the design of nutrition labels to promote healthier food choices and reasonable portion sizes. *International Journal of Obesity*, 38(S1), S25-S33.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4105581/>

Would adopting this option require another element of a food label to be removed from the package? :

Maybe

If so, which labelling elements would be removed?:

Other

Please provide evidence to justify your response. :

- Current voluntary labels
- Voluntary industry logos
- Health claims (general high level)
- Daily intake %

Please attach references here:

No file was uploaded

Not Answered

17 Implementation mechanism

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Regulatory

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

- In our practice it is clear that voluntary implementation does not get picked up by all food manufacturers. For example, Home Brand have not opted to use the health star rating, whereas Sanitarium use it on majority of their products.
- Consumers may assume that a product with the warning label has less sugar than a product without whereas this may not be the case. If it is voluntary it is unlikely any manufacturers will implement advisory labels, as they will deter consumers from their products. If this change was regulatory it would be easier for consumers to compare products.
- It is important that consistency is shown throughout the food environment to minimise confusion by the consumer (Roberto & Khandpur, 2014).

Reference:

Roberto, C. A., Khandpur, N. (2014). Improving the design of nutrition labels to promote healthier food choices and reasonable portion sizes. *International Journal of Obesity*, 38(S1), S25-S33. doi:10.1038/ijo.2014.86
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4105581/>

Please attach references here:

No file was uploaded

Not Answered

Option 6: Pictorial approaches to convey the amount or types of sugars in a serving of food.

18 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome?:

Effective

Please provide evidence to justify your views. :

- Using a simple pictorial approach of a teaspoon, will be easier to understand for people with lower levels of health literacy (Park, Zuniga & Lee, 2016). Therefore, making it an equitable approach.
- Pictorial health education is effective regardless of race/ethnicity, therefore is the most equitable of the options (Park, Zuniga & Lee, 2016).
- A teaspoon is an internationally recognised symbol. Making this user friendly for all different cultures/languages in NZ. The simpler the picture the easier it is for all New Zealanders and Australians to understand, including those who have limited English, English as a second language, or limited mathematical skills.
- However using a pie chart would require the consumer to have a higher level of numeracy, so this is not our preferred option. A pie chart would require interpretation and would not be as easily interpreted by consumers most at risk.
- By having this pictorial on the front of pack it will be more visible to the consumer.
- A pictorial label requires less effort, thought and interpretation from the consumers. This has been proven to work for sugar sweetened beverages in NZ, where a drink with a pictorial warning was less likely to be chosen.
- There is also evidence that pictorial warning labels on tobacco products has reduced consumption in NZ.
- Consumers are able to compare sugar levels across food products to make an informed decision and a judgement on the overall amount of added sugars they are consuming.
- In our practice we have noticed effectiveness in the community through the use of posters showing the amount of sugar in foods and beverages. For example, when these interactive posters are raising awareness in an Early Childhood Education, we have noticed many parents' looking at the amount of sugar in foods and this creates a lot of conversation.

References:

Jungmin Park, Julie Zuniga & Albert Lee (2016) Effectiveness of using picture-based health education for people with low health literacy: An integrative review, *Cogent Medicine*, 3:1.
<https://www.tandfonline.com/doi/full/10.1080/2331205X.2016.1264679>

Ni Mhurchu et al (2016), Effects of plain packaging, warning labels, and taxes on young people's predicted sugar-sweetened beverage preferences: an experimental study, *International Journal of Behavioral Nutrition and Physical Activity*.
<https://ijbnpa.biomedcentral.com/articles/10.1186/s12966-016-0421-7#Tab2>

Hammond D (2011), Health warning messages on tobacco products: a review, *Tobacco Control*, Vol 20, Issue 5.
<https://tobaccocontrol.bmj.com/content/20/5/327.short>

Becker M W et al (2015), Front of pack labels enhance attention to nutrition information in novel and commercial brands, *Food Policy*, Volume 56, October 2015, Pages 76-86.
<https://www.sciencedirect.com/science/article/pii/S0306919215001001>

Talati Z et al (2017), The relative ability of different front-of-pack labels to assist consumers discriminate between healthy, moderately healthy, and unhealthy foods, Food Quality and Preference. Volume 59, July 2017, P.109-113.
<https://www.sciencedirect.com/science/article/abs/pii/S0950329317300502>

Talati Z et al (2016), Consumers' responses to front-of-pack labels that vary by interpretive content, Appetite Volume 101, 1 June 2016, Pages 205-213.
<https://www.sciencedirect.com/science/article/pii/S0195666316300988>

Hieke S, Harris J L (2016), Nutrition information and front-of-pack labelling: issues in effectiveness, Public Health Nutrition, Volume 19, Issue 12, August 2016 , pp. 2103-2105.
<https://www.cambridge.org/core/journals/public-health-nutrition/article/nutrition-information-and-frontofpack-labelling-issues-in-effectiveness/274F716EC7D456CF4DFEAB2>

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

No

Please provide evidence to justify your views. :

The teaspoon pictorial does not require consumers to know how many teaspoons of added sugars are recommended per day. Consumers are able to use the labelling to compare sugar levels across food products to make an informed decision.

Please attach evidence here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

No

Please describe what these are?:

Please attach references here:

No file was uploaded

Not Answered

19 Impacts

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your response.:

Please attach references here :

No file was uploaded

Not Answered

20 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? :

Would adopting this option require another element of a food label to be removed from the package? :

Depends

If so, which labelling elements would be removed?:

Other

Please provide evidence to justify your response. :

- Current voluntary labels
- Voluntary industry logos
- Health claims (general high level)
- Daily intake %

Please attach references here:

No file was uploaded

Not Answered

21 Implementation mechanism

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Regulatory

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

- In our practice it is clear that voluntary implementation does not get picked up by all food manufacturers. For example, Home Brand have not opted to use the health star rating, whereas Sanitarium use it on majority of their products.
- Consumers may assume that a product with the pictorial label has more sugar than a product without said label, however, this may not be the case. If it is voluntary it is unlikely any manufacturers will implement pictorial labels, as these may deter consumers from purchasing their products. If this change was regulatory it would be easier for consumers to compare products.
- Regulatory change may create a need for food manufacturers to assess what they are putting into their products. In some cases, they may even re-evaluate product recipes/formulas to have lower amounts of added sugar to ensure sales do not drop.
- Front of pack pictorial labelling is likely to motivate consumer and manufacture change when it comes to consumption of sugars.
- It is important that consistency is shown throughout the food environment to minimise confusion by the consumer (Roberto & Khandpur, 2014).

Reference:

Roberto, C. A., & Khandpur, N. (2014). Improving the design of nutrition labels to promote healthier food choices and reasonable portion sizes. *International Journal of Obesity*, 38(S1), S25-S33.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4105581/>

Please attach references here:

No file was uploaded

Not Answered

Option 7: Digital linking to off label web-based information about added sugars content

22 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome? :

Effective in combination with another option (please specify below)

Please provide evidence to justify your views. :

- It is known that digital linking to web-based information is not accessed by all. To be able to access web based content the consumer would need a smart phone with data available, and the motivation to check. This would lead to inequitable outcomes.
- However, in combination with some of the other options this may be able to offer more detailed analysis of the product than what can fit on the front of the pack.

Reference:

Atkinson J et al (2014), NZDep2013 Index of Deprivation, Department of Public Health, University of Otago, Wellington.

<https://www.otago.ac.nz/wellington/otago069936.pdf>

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Yes

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Yes

Please describe what these are?:

- An additional weakness is the inequitable outcomes likely to result from implementation of this option alone. This option would only be available to people with access to a smart phone and enough data to use the internet while shopping. This would not be feasible for the whole population, producing inequitable outcomes.
- Furthermore, there is already a New Zealand app called 'Food Switch' which offers similar information. Creating another app would divert resources which could be better utilised elsewhere.

Please attach references here:

No file was uploaded

Not Answered

23 Impact

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

24 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? :

Would adopting this option require another element of a food label to be removed from the package? :

No

If so, which labelling elements would be removed?:

Please provide evidence to justify your response. :

Please attach references here:

No file was uploaded

Not Answered

25 Implementation mechanisms

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Regulatory

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

• Regulatory implementation will reduce misunderstanding. In our practice we have seen that there are clear inconsistencies with voluntary labelling. For example, the health star rating is on some products, not all products. It is important that consistency is shown throughout the food environment to minimise confusion by the consumer (Roberto & Khandpur, 2014).

Reference:

Roberto, C. A., & Khandpur, N. (2014). Improving the design of nutrition labels to promote healthier food choices and reasonable portion sizes. *International Journal of Obesity*, 38(S1), S25-S33.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4105581/>

Please attach references here:

No file was uploaded

Not Answered

Survey Questions 26-30 (on all proposed policy options)

26 Are there additional options that should be considered to address the policy issue and achieve the desired outcome?

No

If yes, please describe your suggested option and how it addresses the policy issue.:

Please provide evidence to justify your response.:

Please attach references here:

No file was uploaded

Please also describe the cost of implementing your proposed option.:

Please provide evidence for costing assumptions.:

Please attach references here:

No file was uploaded

Not Answered

27 Is the description of the strengths and weaknesses of the proposed options (compared to the status quo) accurate? THIS QUESTION HAS BEEN INCLUDED IN QUESTIONS: 5,7,10,14,18, AND 22

28 Are there additional options that should be considered to address the policy issue and achieve the desired outcome?THIS QUESTION HAS BEEN INCLUDED IN QUESTIONS 5,7,10,14,18, and 22

29 If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo.

If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo. Please provide evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

30 Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

- Option 3 - Change to statement of ingredients:

All packaged foods

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

- Option 4 - Added sugars quantified in NIP:

All packaged foods

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

- Option 5 - Advisory labels for foods high in added sugars:

All packaged foods

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

- Option 6 - Pictorial approaches to convey the amount or types of sugars in a serving of food.:

All packaged foods

If you have selected particular foods or food categories in the question above, please specify which foods or food categories where the option should apply. Please provide evidence to justify your response.:

- The proposed options should apply to all packaged foods in Australia and New Zealand.
- In our practice we have seen that there are clear inconsistencies with voluntary labelling. For example, the health star rating is on some products, but not all products. It is important that consistency is shown throughout the food environment to minimise confusion by the consumer (Roberto & Khandpur, 2014).

Reference:

Roberto, C. A., & Khandpur, N. (2014). Improving the design of nutrition labels to promote healthier food choices and reasonable portion sizes. *International Journal of Obesity*, 38(S1), S25-S33.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4105581/>

Please attach references here:

No file was uploaded

Not Answered

Implementation mechanisms

31 Is the description of the pros and cons of the different implementation mechanisms in Table 1 accurate? (Table 1: "Characteristics of the proposed implementation mechanisms").

Voluntary:

Accurate

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Code of Practice - Voluntary:

Accurate

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Code of Practice - Government driven:

Accurate

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Regulatory:

Accurate

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Not Answered

32 Are there other pros and cons associated with the different implementation mechanisms?

Voluntary - are there other pros and cons?:

No

Voluntary: If yes, other pros and cons associated with this mechanism.:

Please attach references here :

No file was uploaded

Code of Practice - Voluntary: are there other pros and cons?:

No

Code of Practice - Voluntary: If yes, other pros and cons associated with this mechanism.:

Please attach references here:

No file was uploaded

Code of Practice - Government driven: are there other pros and cons?:

No

Code of Practice - Government driven: If yes, other pros and cons associated with this mechanism.:

Please attach references here:

No file was uploaded

Regulatory: are there other pros and cons?:

No

Regulatory: If yes, other pros and cons associated with this mechanism:

Please attach references here:

No file was uploaded

Not Answered

Impact analysis (costs and benefits)

33 Are there any other benefits or costs associated with the proposed labelling options which have not been identified?

Not Answered

If yes, please provide details here, using evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

34 Should there be exemptions or other accommodations (such as longer transition periods) made for small businesses, to minimise the regulatory burden?

No

If so, what exemptions or other accommodations do you suggest? Please justify your response.:

Please attach references here:

No file was uploaded

Not Answered

35 What would be the cost per year for industry to self-regulate (e.g. voluntary code of practice-industry driven)?

What would be the cost per year for industry to self-regulate. Please justify your response with hours of time, and number of staff required.:

Please specify which country (Australia or New Zealand) your evidence is based on.:

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Not Answered

36 Would industry pass any of the costs associated with implementing the proposed options on to consumers?

Would industry pass any of the costs associated with implementing the proposed options on to consumers?:

What is the basis for your view?:

Please attach references here:

No file was uploaded

Not Answered