

29 November 2023

Dear Minister

RE: P1062 – Defining added sugars for claims

The Australian Institute of Food Science and Technology (AIFST) is a not-for-profit organisation representing food industry professionals working in all facets of the food industry including food science, food technology, engineering, sensory, new product development, innovation, regulatory, QA, nutrition, microbiology, and food safety, as well as those in leadership positions within the academic, public, and private sectors.

AIFST's mission is to advance and inspire all food sector professionals through education, collaboration, and recognition, to champion a robust, innovative, science-based Australian food industry to meet future food needs.

The AIFST welcomed the opportunity to provide input into the 'Call for Submissions' in October 2023.

The Approval Report published on November 17 contains significant deviations from the Call for Submissions paper. The implications of the proposed changes to the Food Standards Code (the Code) to clarify and define "added sugars" to make voluntary claims on food and beverage products (P1062) are significant. These changes have been made with no opportunity provided for further industry consultation.

AIFST consider these changes will have far wider impacts on a separate, concurrent proposal which is addressing the definition of added sugar for mandatory labelling in the nutrition information panel (P1058). The results of P1062 will feed into P1058. While the Added Sugar claim discussed in P1062 is optional, results from P1058 will be mandatory, and will have far reaching implications for Industry. Treating these proposals separately, when they are interrelated, is likely to have a negative impact. Further, the AIFST asks that the consumer research which FSANZ is undertaking in 2024 to support P1058, also seeks to clarify the impact of the P1062 draft variation on consumer understanding of added sugars. FSANZ has acknowledged these are inter-related proposals, and therefore has allowed a four-year transition period for the P1062 changes.



AIFST requests FSANZ to proceed with normal statutory processes for general procedures, which includes the option to provide further consultation opportunities. Given the complexity and disparity of stakeholder views, we request a further round of stakeholder consultation. The Approval Report reiterates the importance of regulatory coherence and that FSANZ expects Code amendments arising from P1062 will need to be reviewed as part of its assessment of P1058. Given the extent of changes, a second-round consultation will enable stakeholders to consider the broader impact of these changes, including trade implications.

I would welcome the opportunity to discuss with you our specific concerns on the approved draft variations to the Code and the process in general.

Sincerely

Fiona Fleming

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Chief Executive Officer

Australian Institute of Food Science and Technology Limited (AIFST)