

Submission to FSANZ: Preliminary position paper on the Nutrition Information Panel Review

**Response to consultation
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Recipient

FSANZ

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Dietitians Australia acknowledges all traditional custodians of the lands, waters and seas that we work and live on across Australia. We pay our respect to Elders past, present and future and thank them for their continuing custodianship.

The leading voice in nutrition and dietetics

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 9000 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for the profession and the people and communities we serve.

The Accredited Practising Dietitian (APD) program provides an assurance of safe, quality dietetic practice and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in public health and food system regulation, including regulation of labelling, to empower consumers to make informed decisions and to enable them to navigate a complex food system to identify healthy food options.

This submission was prepared by Dietitians Australia staff in consultation with expert members following the [Conflict of Interest Management Policy](#) and processes approved by the Board of Dietitians Australia. Contributors include Dietitians Australia members with wide ranging expertise in areas including clinical practice, public health and food systems.

Executive summary

Dietitians Australia welcomes the opportunity to comment on FSANZ's Preliminary Position Paper on the Nutrition Information Panel (NIP) Review. We agree that the NIP largely meets its intended purposes, providing essential nutrition information to consumers and supporting monitoring and accountability. However, targeted improvements are required to strengthen public health outcomes, empower consumers, and ensure clinical safety.

Key priorities

- **Added sugar labelling**
 - Mandatory declaration of added sugars is essential to align with dietary guidelines, enable informed consumer choice, and support broader public health policies.
 - FSANZ should progress Proposal P1058 and re-engage with Food Ministers on this priority.
- **Dietary fibre inclusion**
 - Fibre should be required in the NIP to support monitoring and enforcement of a mandatory Health Star Rating (HSR) System and to reflect its critical role in chronic disease prevention.
- **Mandatory potassium labelling**
 - Potassium is both a nutrient of public health importance and a clinical safety concern.
 - Mandatory labelling will:
 - Support hypertension and cardiovascular disease prevention.
 - Protect vulnerable populations with chronic kidney disease (CKD) or heart failure from hyperkalaemia.
 - Improve transparency, equity, and clinical practice.
 - FSANZ should amend Standard 1.2.8 to require potassium content (mg per serving and per 100g) on all packaged foods, with clear guidance for products containing potassium additives.
- **Removal of voluntary information**
 - Voluntary inclusions (eg, %DI/RDI values, calories instead of kilojoules) risk confusing consumers and undermine consistency.
 - FSANZ should remove voluntary information to ensure clarity and comparability.

Additional Considerations

- **Future improvements** - address issues such as label salience, serving size standardisation, tolerance levels, and the impact of claims on consumer interpretation.
- **Evidence and transparency** - publish detailed methodologies and results underpinning the Preliminary Position Paper to build trust and confidence.
- **Online and digital labelling** - Ensure equivalent nutrition information is displayed prior to purchase in all settings, and regulate digital content linked from packaging to prevent misuse.

Discussion

Dietitians Australia welcomes the opportunity to comment on the Preliminary Position Paper on the Nutrition Information Panel (NIP) Review prepared by Food Standards Australia New Zealand (FSANZ).

As the leading voice of nutrition and dietetics in Australia, we recognise the critical role of the NIP in supporting informed consumer choices, enabling monitoring and accountability, and underpinning initiatives to improve the healthiness of food environments. We agree with FSANZ that the NIP largely meets its intended purposes and does not require significant structural changes. However, targeted improvements are necessary to better protect and promote public health outcomes and consumer interests.

We emphasise that these improvements can be progressed through other active and future FSANZ workstreams, and do not need to be resolved solely within the NIP Review. Importantly, they should be introduced alongside a mandatory Health Star Rating (HSR) System to minimise labelling changes for industry and maximise consumer benefit.

Key priorities for action

Added sugar labelling

Dietitians Australia's key priority is the incorporation of added sugar labelling into the NIP.

- The absence of added sugar information is inconsistent with current food policy and undermines informed consumer choice.
- It prevents alignment with official dietary guidance and limits the use of added sugar data in broader public health programs.
- Food Ministers have previously acknowledged that current sugar labelling does not provide adequate contextual information for consumers.
- FSANZ has reported that while quantifying added sugars presents some complexities, no technical barriers exist.

We urge FSANZ to progress Proposal P1058 (Nutrition Labelling About Added Sugars) and re-engage with Food Ministers and jurisdictional agencies on this priority.

Inclusion of dietary fibre

To support monitoring and enforcement of a mandatory HSR System, dietary fibre should be required in the NIP.

- Fibre is a critical nutrient for public health, strongly linked to reduced risk of chronic disease.
- Its inclusion would strengthen the accuracy and accountability of the HSR System.
- This change could be implemented in parallel with mandating HSR, ensuring consistency and clarity for consumers.

Mandatory potassium labelling

Dietitians Australia strongly recommends mandatory potassium labelling on all packaged foods.

Potassium is both a nutrient of public health importance and a clinical safety concern.

- Population health benefits - most Australians and New Zealanders consume insufficient potassium and excessive sodium, contributing to high rates of hypertension, cardiovascular disease, and stroke. Increased potassium intake is linked to reduced blood pressure and improved cardiovascular outcomes.
- Clinical safety - for people with chronic kidney disease (CKD) or heart failure, excess potassium intake can cause hyperkalaemia, a life-threatening electrolyte imbalance. Potassium additives are more bioavailable than natural food sources, increasing risk. Without clear labelling, consumers and clinicians cannot manage intake safely.
- Equity and transparency - current labelling rules (Standard 1.2.8) only require potassium to be listed if a claim is made, creating gaps in transparency. This disproportionately affects disadvantaged populations who rely on packaged foods and limits health professionals' ability to provide tailored guidance.

We recommend FSANZ:

1. Amend Standard 1.2.8 to require potassium content (mg per serving and per 100g) on all packaged foods.
2. Provide clear labelling guidance for foods with potassium-containing additives (eg, potassium chloride, potassium citrate), electrolyte beverages, plant-based food alternatives, and other emerging food categories with variable potassium content.
3. Collaborate with industry to support reformulation efforts using improved sodium-to-potassium ratios.
4. Ensure consumer-friendly labelling that supports both general health promotion and specific clinical needs, including consideration of warning symbols for high-potassium foods.
5. Align with international best practice, noting that the United States has already mandated potassium labelling.

Mandatory potassium labelling is not only a public health opportunity but a clinical safety necessity. It empowers consumers, protects vulnerable populations, and supports evidence-informed dietary guidance. Please refer to Attachments 1 and 2 for more detailed information.

Removal of voluntary information

Voluntary inclusions in the NIP (eg, %DI/RDI values, calories instead of kilojoules, or non-mandatory nutrient declarations) risk misleading or confusing consumers.

- FSANZ's own consumer research highlights the importance of a consistent format for nutrition information.
- Allowing voluntary inclusions undermines this consistency and consumer understanding.

- We recommend removing voluntary information to ensure clarity, comparability, and trust in the NIP.

Future improvements

Several issues raised during the NIP Review warrant further consideration in future workstreams:

- Label salience and visibility
- Serving size standardisation
- Tolerance levels for nutrient values
- Potential for claims to interfere with consumer interpretation of the NIP.

These matters should be noted for ongoing action to strengthen the effectiveness of food labelling.

Evidence and transparency

Given the importance of NIP-related issues to public health, Dietitians Australia strongly recommends that FSANZ publish detailed methodologies and results underpinning the Preliminary Position Paper and any final report to Food Ministers. Transparency will build trust and confidence in FSANZ's processes and decisions.

Other Related Work

Online Labelling

We welcome progress by the Food Regulation Standing Committee on online labelling.

- Regulatory requirements should ensure equivalent nutrition information is displayed to consumers prior to purchase, regardless of setting.
- Information must be readily visible and legible to users to support informed decision-making.

Digital Labelling

Dietitians Australia is concerned about the potential removal of mandatory health and nutrition information from packaging in favour of digital-only formats (eg, QR codes).

- Such moves risk alienating consumers, entrenching inequities, and diluting the effectiveness of labelling.
- We support FSANZ regulating digital content linked from packaging, ensuring only regulated information is displayed and preventing marketing misuse.

Conclusion

Dietitians Australia supports FSANZ's conclusion that the NIP largely meets its intended purposes. However, we urge FSANZ and Food Ministers to prioritise:

- Incorporation of added sugar labelling

- Inclusion of dietary fibre
- Mandatory potassium labelling
- Removal of voluntary information
- Transparency in evidence and methodologies

These changes, alongside a mandatory HSR System, will strengthen the NIP's role in protecting public health and empowering consumers to make informed dietary choices.