

Food Regulation Standing Committee Consultation: Policy guideline on information requirements for prepackaged food sold online

Response to consultation
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Recipient

Food Regulation Standing Committee

Submitted via online survey: <https://consultations.health.gov.au/chronic-disease-and-food-policy-branch/policy-guideline-food-sold-online/>

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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.

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 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 safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in the food system to support consumers in making healthy food choices and companies with product formulation, marketing, consumer education and compliance.

This submission was prepared by staff of Dietitians Australia in collaboration with The George Institute following the [Conflict of Interest Management Policy](#) and processes approved by the Board of Dietitians Australia.

Executive summary

Dietitians Australia strongly supports the development of a policy guideline on information requirements for prepackaged food sold online. As the peak body representing dietitians, we emphasise that consumers must have equitable access to clear, comprehensive, and accessible nutrition and health information at the point of purchase, regardless of whether food is bought in-store or online.

Online food retail has grown rapidly, yet consumers currently face significant gaps in access to mandatory labelling information. Research shows that nutrition panels, ingredients lists, allergen declarations, Health Star Ratings (HSR), and alcohol health warnings are inconsistently displayed online, often buried in product images or hidden behind additional clicks. This undermines informed choice, poses risks to health and safety, and disproportionately affects vulnerable groups, including people with vision impairments, those living in food deserts, and individuals reliant on online shopping for convenience or accessibility.

Dietitians Australia recommends that the policy guideline:

- Mandates online labelling equivalent to in-store requirements, including nutrition panels, ingredients, allergens, country-of-origin, alcohol warnings, and any future mandatory arrangements such as HSR.
- Requires prominent placement of information on the same page and within the same field of vision as the purchase/add-to-cart button, separate from product images.
- Establishes minimum legibility and accessibility standards, including font size, colour contrast, plain language, screen-reader compatibility, and alt text for images.
- Prohibits reliance on QR codes, pop-ups, or extra navigation to access mandatory information.
- Ensures consistency across platforms and devices, including desktop, mobile, and apps.
- Ensures all HSR ratings are displayed – including low-scoring ratings.
- Includes alcohol products explicitly within scope.
- Commits to implementation into regulation, with monitoring and enforcement mechanisms to ensure compliance.

We further recommend strengthening the overarching policy principles to clarify that information standards must apply equally across all retail environments, and that 'access' must encompass legibility, salience, and location. Specific reference should be made to the HSR to prevent selective omission of lower scores.

This policy guideline, when translated into regulation, will improve health equity, empower consumers to make safe and informed food choices, and support national nutrition priorities. Dietitians Australia urges the Food Regulation Standing Committee to act swiftly to ensure mandatory, visible, and accessible online labelling across all food and alcohol retail platforms.

Discussion

Dietitians Australia welcomes the opportunity to provide feedback on the proposed policy guideline regarding information requirements for prepackaged food sold online. As the peak body representing dietitians in Australia, we strongly support measures that ensure consumers have equitable access to clear, comprehensive, and accessible nutrition and health information, regardless of whether they purchase food in physical or online retail environments.

Our submission draws on evidence from recent research, including findings from The George Institute for Global Health, and aligns with our broader advocacy for mandatory nutrition labelling, the Health Star Rating (HSR) system, and the review of the Australian Dietary Guidelines.

Problem Statement

Consumers shopping online for food required to bear a label in Australia and New Zealand do not consistently have access to the same information as those shopping in physical stores. This inequity undermines informed choice, contravenes Codex Alimentarius guidance, and poses risks to consumer health and safety.

We agree with the problem statement and emphasise that salience, legibility, and accessibility of information are critical dimensions that must be explicitly addressed.

Desired Outcome

We support the proposed desired outcome: clarity on the information that Food Ministers expect to be provided for online retail sale of food required to bear a label. Consumers should have access to mandatory food labelling information at the point of purchase, displayed prominently and legibly, to enable safe and informed decisions.

Key Recommendations

1. Mandatory online labelling equivalent to in-store requirements
All mandatory labelling requirements for physical products must be applied to online environments, including:
 - Nutrition/Energy Information Panel
 - Ingredients list
 - Allergen declarations
 - Country-of-origin information
 - Mandated alcohol health warnings (eg, pregnancy warning label)
 - Any future mandatory arrangements (eg, HSR if mandated)
2. Prominent placement at point of purchase
Required information must be displayed on the same page and within the same field of vision as the purchase/add-to-cart button, in a consistent and prominent location, separate from product images.

3. Legibility and accessibility standards
Establish minimum specifications for font size, colour contrast, headings, and plain language. Ensure compatibility with screen readers and provide alt text for images to support equitable access, particularly for consumers with vision impairments.
4. Direct access without additional steps
Prohibit reliance on QR codes, pop-ups, or extra navigation to access mandatory information. Information must be immediately visible on the product page.
5. Consistency across platforms and devices
Require uniform presentation standards across desktop sites, mobile sites, and apps to reduce consumer confusion.
6. Health Star Rating display
Where HSR is present on packaging, it must also be displayed online. Both high and low ratings must be shown to avoid selective omission. This aligns with consumer expectations and supports informed choice.
7. Scope includes alcohol
Explicitly include alcohol products to ensure mandated warnings (eg, pregnancy warning labels) and health information are visible online.
8. Implementation into regulation
The guideline must be translated into enforceable regulation to ensure compliance and accountability.

Policy Principles

We recommend strengthening the overarching principles by:

- Removing the statement that online environments are “inherently different” from physical environments. Information standards should apply equally at point of sale, regardless of setting.
- Clarifying that ‘access’ includes legibility, salience, and location of information.
- Explicitly prohibiting provision of information solely via images, QR codes, or additional steps.

Alignment with Broader Nutrition Policy

This policy guideline should be considered alongside other nutrition policy priorities, including:

- Mandating the HSR system to ensure consistent application across physical and online environments.
- Reviewing and updating the Australian Dietary Guidelines to reflect current evidence and ensure alignment with labelling practices.
- Supporting public education initiatives to improve consumer understanding of nutrition information.

Implementation and monitoring

To ensure effectiveness, the guideline must:

- Be communicated clearly to industry stakeholders, including retailers, manufacturers, distributors, and third-party platforms.
- Include mechanisms for monitoring and enforcement of compliance.
- Be adaptable to future evolutions in online retail environments, including aggregator platforms and emerging technologies.

Responses to specific consultation questions

Q10 – Are you aware of any other relevant background information that should be considered?

We refer you to the 2022 study by The George Institute (Maganja et al; IJBNPA; <https://doi.org/10.1186/s12966-023-01504-3>) analysing the nutrition and composition details of products shared online showing 49% of products displayed Nutrition Information Panels, 34% displayed complete ingredients lists, and 53% displayed appropriate allergen statements.

The George Institute has also demonstrated that important health information required on alcohol product packaging is absent in the online environment, eg, mandatory pregnancy warning labels are largely invisible at point of sale online (Pettigrew et al.; Drug and Alcohol Review; <https://doi.org/10.1111/dar.13836>).

Q14 – Are you aware of any unintended consequences for developing a policy guideline for information requirements for prepackaged food sold online?

The guideline must be sufficiently broad to cover existing platforms while retaining flexibility to adapt to future developments in online food and alcohol retail. An overly narrow approach could create unintended consequences by overlooking emerging technologies and evolving sales models.

Q18 – Do you agree with the proposed overarching policy principles for the *policy guideline on information requirements for prepackaged food sold online*?

No. The assertion that online retail settings differ from physical stores, and therefore may require distinct information rules, is redundant and can be omitted. Similarly, the use of “generally” at the start of the following statement is unnecessary. That point should instead be expressed as:

“Information standards designed to safeguard food safety and support healthy, informed choices must apply at the point of sale, irrespective of whether the purchase occurs online or in-store.”

In addition, the concept of ‘access’ must extend beyond availability to encompass both the clarity and placement of information. Mandatory details should appear on the same webpage, within the immediate field of view of the purchase or add-to-cart button, in a consistent and prominent position, and separate from product images (not confined to photographs of packaging). Minimum requirements for legibility should be established, including font size thresholds, strong colour contrast, clear headings, and plain language where appropriate. Accessibility standards must also be mandated, such as screen-reader compatibility and alt text for images containing required information, to ensure equitable access for all consumers, particularly those with vision impairments. Importantly, ‘access’ must not be defined as information that is only available through images, QR codes, or additional navigation steps.

Q19 – Should specific reference be made to providing the Health Star Rating information when present on the food label?

Dietitians Australia advocates that Health Star Ratings must be displayed wherever food is sold—online and in-store. Analyses conducted by The George Institute show HSRs are inconsistently presented online, often absent for lower-scoring products, reinforcing concerns that the voluntary system functions as a marketing tool. Evidence demonstrates that visible HSRs guide consumers toward healthier choices (<https://doi.org/10.1016/j.foodqual.2018.11.005>), and Australian research (Gupta A, 2025; <https://doi.org/10.1186/s12889-025-22839-5>) confirms familiarity with the system in physical settings can positively influence online purchasing. To ensure equity and consistency, policy guidelines should mandate that any labelling required on packaging—including HSRs—must also be displayed online.

Q20 – Do you agree with the other proposed specific policy principles?

Dietitians Australia recommends that the guideline clearly stipulate how health and nutrition information must be presented in online food and alcohol retail environments. To ensure consistency and equity, this information should be standardised, easy to read, and positioned in a dedicated, prominent location—separate from product images—on the same page and within the immediate field of vision of the purchase or add-to-cart button.

We further urge the establishment of minimum requirements for legibility, including defined font size thresholds, strong colour contrast, clear headings, and the use of plain language where appropriate. Accessibility must also be embedded into design standards, with mandatory features such as screen-reader compatibility and alt text for images that convey required information. These measures are critical to guarantee equitable access for all consumers, particularly those with vision impairments, and to ensure that online labelling provides the same level of clarity and protection as physical packaging.

Q21 – Do you have any other feedback on the proposed policy guideline?

The policy guideline should set a clear expectation that its principles regarding the provision of equivalent information to consumers prior to purchase, regardless of setting, will be incorporated into regulation or otherwise made mandatory as soon as possible.

Q22 – Please provide any other comments or points for consideration that may not have been addressed in this consultation

Dietitians Australia notes that online food retail has expanded significantly since the COVID-19 pandemic and continues to evolve rapidly. It is therefore critical that the proposed policy guideline be translated into enforceable regulatory requirements without delay.

To ensure consumers have access to the information they need, the guideline must also address:

- **Clear communication to industry stakeholders:** including manufacturers, distributors, retailers, online sellers, and any organisations hosting or displaying products for sale.
- **Robust monitoring and enforcement mechanisms:** to guarantee compliance and protect consumers.

Effective regulation will advance health equity. Online shopping offers convenience and can improve access for people with visual, physical, or other impairments, as well as those who are time-poor, geographically isolated, living in food deserts, or reliant on public transport. Ensuring that product information is consistently visible, accessible, and equivalent to in-store labelling will better support these groups—who often face poorer health outcomes—to make safe and nutritious choices.

We support the proposed scope but recommend clarifying that the guideline must extend beyond traditional retailer websites and apps to include aggregator platforms and other non-traditional online sales environments. These channels are increasingly common and pose similar risks when

product information is incomplete or inaccessible. Explicit inclusion will ensure consistency and consumer protection across all online purchasing pathways.

Finally, the guideline should be framed broadly enough to cover current platforms while remaining adaptable to future developments in online food and alcohol retail. A narrow approach risks unintended consequences by failing to anticipate emerging technologies and evolving sales models.

Conclusion

Dietitians Australia strongly supports the development of a policy guideline on information requirements for prepackaged food sold online. Ensuring equivalent, legible, and accessible nutrition information across all retail environments is essential to protect consumer health, promote equity, and enable informed food choices. We urge FRSC to translate this guideline into regulation without delay.

Dietitians Australia is available to provide further input and collaborate on implementation strategies to strengthen nutrition labelling and consumer protection in online food environments.