

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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17 November 2014

SUBMISSION

Attention: **Project Manager – A1101**
Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Commencement of Dietary Fibre Claim Provisions

FTA Australia has reviewed this [Application](#) and endorses the following comments of the Technical Sub Committee:

Attachment 1 – Submission template for A1101 – Commencement of Dietary Fibre Claim Provisions

To assist us in compiling submissions, please complete the tables below.

Submitter name and company name: Food Technology Association of Australia Del Teesdale - President

Part A – Questions for food industry

Question 1

In the table below, please give the total number of products and stock-keeping units (SKUs¹) you currently sell that carry nutrition content claims about dietary fibre (e.g. claims such as *source*, *good source*, and *excellent source* of dietary fibre or synonyms of these descriptors).

Item	Number of products	SKUs ¹
Products currently for sale that carry nutrition content claims about dietary fibre	No information available from members.	No information available from members.

¹ SKU - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

Question 2

In the table below, please give the number of products and SKUs¹ you currently sell that do not meet the requirements for nutrition content claims about dietary fibre in Standard 1.2.7 (i.e. the qualifying criteria) and require changes.

Item	Number of products	SKUs ¹
Products currently for sale that carry nutrition content claims about dietary fibre that do not meet the qualifying criteria in Standard 1.2.7	No information available from members.	No information available from members.

¹ SKU - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

Question 3

Before October 2014, did you make labelling changes in order to comply with the requirements for nutrition content claims about dietary fibre?

Please check the appropriate YES/NO box

☐ **Yes** Please provide the number of SKUs¹ involved and costs in the table below.

Please also indicate if the cost of labelling changes can be undertaken at the same time as other labelling changes for marketing or other purposes in the table below.

Item	Number of SKUs ¹ (up to October 2014)	Labelling change combined with other labelling changes? (YES/NO)	Direct cost ² of labelling change ³ (up to October 2014)
Labelling changes	No information available from members.	No information available from members.	No information available from members.

¹ SKU - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

² **Direct cost** of labelling change: labelling design, labelling production, proofing, package redesign and labour

³ Please provide only the **additional cost** for this labelling change if it was part of a routine or regular change, e.g. when you made a change for marketing purposes.

OR

☐ **No** I have not made any labelling changes before October 2014 in order to comply.

No information available from members.

Question 4

Before October 2014, did you reformulate products in order to comply with the requirements for nutrition content claims about dietary fibre?

Please check the appropriate YES/NO box.

☐ **Yes** Please provide the number of products and costs in the table below.

Item	Number of products (up to October 2014)	Cost ¹ (up to October 2014)
Product reformulation	No information available from members.	No information available from members.

OR

☐ **No** I have not reformulated any products.

No information available from members.

Question 5

Between October 2014 and the end of the transition period for Standard 1.2.7, will you be making labelling changes in order to comply with the requirements for nutrition content claims about dietary fibre?

Please check the appropriate YES/NO box.

☐ **Yes** Go to **Question 6**.

☐ **No** Go to **Question 8**.

No information available from members.

Question 6

In the table below, please give the *direct* cost (i.e. for label design and printing costs) of labelling changes required to be compliant with the requirements in Standard 1.2.7 for nutrition content claims about dietary fibre:

- (a) if the transition period remains at 18 January 2016
(b) if the transition period is extended to 18 January 2017

Please also indicate if the cost of labelling changes can be undertaken at the same time as other labelling changes for marketing or other purposes in the table below.

Item	Number of SKUs ¹ to be relabelled	Labelling change combined with other labelling changes? (YES/NO)	Direct cost ² of labelling change ³
Transition period ending 18 January 2016	No information available from members.	No information available from members.	No information available from members.
Transition period ending 18 January 2017	No information available from members.	No information available from members.	No information available from members.

¹ **SKU** - refers to a stock-keeping unit, a unique identifier for each distinct product that can be purchased in business.

² **Direct cost** of labelling change: labelling design, labelling production, proofing, package redesign and labour

³ Please provide only the **additional cost** for this labelling change if it was part of a routine or regular change, e.g. when you made a change for marketing purposes.

Question 7

In the table below, please give the **indirect** cost (in terms of recalled products, written off products and packaging) of labelling changes required to be compliant with the requirements in Standard 1.2.7 for nutrition content claims about dietary fibre:

- (a) if the transition period remains at 18 January 2016
(b) if the transition period is extended to 18 January 2017

Item	Indirect costs (in terms of recalled products, written off products and packaging)
Transition period ending 18 January 2016	No information available from members.
Transition period ending 18 January 2017	No information available from members.

Question 8

Between October 2014 and the end of the transition period for Standard 1.2.7, will you be reformulating products in order to comply with the requirements for nutrition content claims about dietary fibre?

Please check the appropriate YES/NO box.

☐ **Yes** Go to **Question 9**.

☐ **No** Go to **Part B**.

No information available from members.

Question 9

In the table below, please indicate the number of products that are likely to be reformulated and the cost of reformulation:

- (a) if the transition period remains at 18 January 2016
(b) if the transition period is extended to 18 January 2017

Item	Number of products to be reformulated	Cost of reformulation
Transition period ending 18 January 2016	No information available from members.	No information available from members.
Transition period ending 18 January 2017	No information available from members.	No information available from members.

Question for all stakeholders

Question 10

Please indicate your preference for the commencement date of the provisions in Standard 1.2.7 – Nutrition, Health and Related Claims for nutrition content claims about dietary fibre.

Please check the appropriate box.

☐ **Retain** 18 January 2016

☒ **Change to 18 January 2017**

☐ **No preference for either date**

Please state your reasons in the box below.

Reasons to support your answer

To provide more time for industry to complete development, if required and to ensure new labels are designed, checked for compliance, etc prior to final commitment to print,

[REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this Inquiry.

Yours sincerely,

Del Teesdale
PRESIDENT – FTA AUSTRALIA