



**Nestlé**

Nestlé Submission

Commencement of Dietary Fibre Claim Provisions

Application A1101

05 May 2015

[REDACTED]  
Regulatory Affairs Manager

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## **Executive Summary**

This submission is made on behalf of Nestlé Australia Ltd and Nestlé New Zealand Ltd., and Cereal Partners Worldwide (CPW).

**Nestlé welcomes the opportunity to support the application from the Australian Food and Grocery Council to delay the requirement to comply with the qualifying criteria for nutrition content claims about dietary fibre in Standard 1.2.7 – Nutrition, Health and Related Claims for 12 months from and including 18 January 2016 until and including 17 January 2017.**

The criteria for dietary fibre which was gazetted as part of Std 1.2.7 contained higher levels of fibre to make a nutrient content claim compared to the criteria that industry was using as part of the voluntary 1995 Code of Practice on Nutrient Claims in Food Labels and in Advertisements (CoPoNC) (National Food Authority, 1995)

However, as a result of representation by some industry members, FSANZ agreed to re-look at the new (higher) fibre criteria which was regulated with Std 1.2.7 during the transition period for this standard. The issue was debated over the first 12 months of the transition period and therefore, Nestlé & CPW consider that for this period of time, food manufacturers were in a state of regulatory uncertainty.

Nestlé & CPW manufacture a range of products which either required reformulation to meet the fibre levels in Std 1.2.7 and / or required labelling changes to change the fibre claim made.

Information and detailed timings on stages for reformulation to increased fibre levels have been previously provided.

An Application has been raised by AFGC on behalf of industry to allow a further 12 months for transition of the dietary fibre criteria in Std 1.2.7, to allow industry to recoup the lost time taken by the 12 month consultation which happened in 2013.

The extra transition time is important for products which require reformulation, to take into account the many stages of such product development and reformulation.

Substantial costing information was provided in previous submissions made to FSANZ on this topic as well as the most recent submission in November 2014 demonstrating that extending the transition time by 12 months to comply with the fibre criteria to make a nutrition content claim will result in cost savings in the form of less packaging write off to comply with the current transition time of January 2016.