



6 July 2015

Food Standards Australia New Zealand
2610 The Terrace
WELLINGTON 6143
By email: submissions@foodstandards.gov.au

Tēnā koe

Re: Proposal P1037 Amendments associated with Nutrition Content & Health Claims

The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the above consultation. NZNO has consulted with members and staff, particularly members the College of Primary Health Care Nurses and College of Children and Young Persons Nurses, Te Rūnanga o Aotearoa, representing our Māori nurse members, and nursing, research and policy advisers.

NZNO **does not support** the proposed exemptions from claim requirements in the Food Standards Code for trademarked elements of the Health Star Rating System. We do not believe that the star rating system is at all duplicative of the nutrition information panel; the purpose and the information are very different for each. The star rating system is one form of a simplified consumer guide, but does not provide the detailed nutritional information needed and wanted by many consumers, including those with significant health issues. The star rating system should be an adjunct to the scientific information panel, rather than replace it. Such systems are a useful marketing advice but because they are inherently simplistic and do not contain all the information, they are prone to misinterpreted and may lead to adverse consequences.

Nāku noa, nā

[Redacted signature]

[Redacted]
Senior Policy Analyst
[Redacted]
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NEW ZEALAND NURSES ORGANISATION (NZNO)

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 46,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces Te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse*.