



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

24 March 2009

S09.04

Submission to the New Zealand Food Safety Authority – Joint Food Standards Group on the Consultation Paper for a Front of Pack Labelling Policy Guidelines

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 nationally organised societies and national members. It has 28 branches spread throughout the country to which women from some 150 societies are affiliated, as well as individual members.

The Council's function is to serve women and the family and the community at local, national and international levels through research, study, discussion and action. NCWNZ has a longstanding history of encouraging the promotion of social and health issues particularly as they affect women and children.

NCWNZ welcomes the opportunity to consider this discussion document.

Due to the short time available for consultation, this submission is based on responses from NCWNZ members, Corresponding Members and the Nucleus Group of the Consumer Affairs Standing Committee.

NCWNZ has, in the past, made many submissions on the subject of product labelling. These represented the views and opinions of a larger number of the membership and the responses have always urged the introduction of labels on all products that provide clear, accurate and honest information to the consumer. A uniform Front of Pack Labelling (FOPL) system, designed to give consumer choice of healthier food options would, in the opinion of the members canvassed, be an effective health strategy.

Responses to questions in the Consultation Paper received from NCWNZ members are key considerations for a draft Ministerial Policy Guideline.

Q. Do you agree with the key considerations identified?

Yes. Responses did not indicate their reasons but agree with the considerations to address the issues discussed under the problem definition section.

Q. Are there any other key considerations that should be taken into account?

No. Details or comment made in responses, other than a request to include country of origin on any labels where product or ingredients are not made/ grown/ packaged in New Zealand. No other key considerations were identified as necessary to address the issues already discussed.

Discussion

1. Guiding Consumer Choice

Q. Do you consider that consumers should be supported to enable them to be able to compare foods consistently across the whole food supply or within a food category?

Yes. Ideally, where practical, consumers should be able to compare food across the whole food supply. Consumers are bombarded with advertising without the information to make informed





choices in a way that is difficult to decipher or, for some elderly, impossible to read. This will avoid consumer confusion if labelling is consistent either way.

Q. Do you consider that the information provided should relate to individual nutrients, whole foods or others?

Responses were varied some supporting information relating to individual nutrients and others to whole foods. The overall opinion was that information provided should be understandable and meaningful across all socio- economic groups, low literacy and/or low numeracy groups and linguistically diverse groups. Many food labels are presently complex, confusing and difficult to understand. To increase consumer knowledge, the information must be clear, concise, comparable and readable. FOPL, if simplified, will provide increased consumer awareness and guide them to food and drinks consistent with Australian and New Zealand dietary guidelines. A few responses considered Nutrition Information Panel (NIP) labels confusing and suggested it would be far better to educate the public on the meaning of NIP rather than including more writing on the packaging.

111 Effects on the environment of which consumers make choices

Q. Are there any other aims that should be considered?

Responses supported the aims as proposed. Some responses considered country-of-origin labelling would help consumers make more sustainable and healthy choices. Others considered an attempt should be made to make unprocessed and fresh food less expensive, also local retailers should be encouraged to access local supplies of fresh food in order to meet the proposed aims.

Q. To what degree are these aims or any other aims you believe should be considered consistent with or different from current FOPL schemes?

Members' responses did not indicate any preference or make comment on this question other than to include country-of-origin on the label. Any aims considered should influence consumer choice of healthier food and drink options and include labelling of fresh produce and unprocessed food with FOPL.

Q. Should there be a priority list for the aims provided in the policy guideline?

Members' responses agreed that the aims should be prioritised to guide consumer choice of healthy food and drink options; be understanding and meaningful; be consistent with other health strategies and take into account effects on the environment in which consumers make choices. A priority list should be structured around these categories.

Q. While questions about whether or not a scheme will be developed will not be made at this time, do you have a view on whether any such schemes should be mandatory or voluntary to achieve the aims of FOPL. Why?

Members' opinions, on whether or not a scheme should be mandatory or voluntary to achieve the aims of FOPL, were mostly in favour of a mandatory scheme. The scheme should have extremely clear requirements and effective penalties for misrepresentation. If it is assumed that purchases will be made on the basis of information provided, then all packaging must provide consistent information so that realistic comparisons can be made. Inaccurate statements and information on labels could exacerbate health issues e.g. diabetes. A few responses indicated support for voluntary directives; these members considered that some products are more obviously in need of FOPL than others. Other products may meet "a less urgent" priority listing and could follow voluntary guidelines.



Additional Policy Guidance

Q. *What other issues should be taken into account if a scheme is developed?*

Concern was expressed about increased costs to the consumer. It was agreed that account should be taken of previous work undertaken by FRSA and existing FOPL schemes and food labelling standards to provide additional policy guidance.

Q. *Do you consider that there should be Ministerial Policy guidance on FOPL?*

Yes. Seventy-five percent of the responses indicated a preference for Ministerial Policy guidance on FOPL. This would allow consistency in decision-making and guidance in producing FOP Labels to co-exist with current schemes; to which goods the FOPL scheme would be applied; and whether the scheme was voluntary or mandatory.

It was agreed that retention of the status quo would not address issues associated with the use of a variety of FOPL schemes; such an issue could be the potential to create consumer confusion.

Q. *Please indicate which policy option you prefer and why?*

The majority of the responses indicated support for option 4. Australia/New Zealand FOPL should be a colour-coded interpretive scheme in order to have all the proposed specific policy principles and allowing previous work to be built on using new future research or information that becomes available.

Q. *Are there any other options that should be considered and why?*

A few responses suggested that colour-coding symbols and icons on labels would also be a good way to recognise food groups and ingredients in products. The Heart Foundation's "tick" is a very recognisable symbol which is effective.

Conclusion

Members' responses to the questions clearly indicated support for FOPL.

The more information clearly displayed and the more consumer education through point-of-sale advice, the sooner that consumers from all socio-economic groups will learn and adapt to considering product content before purchasing.

Increasing consumer awareness of foods, that contribute to increasing or decreasing the risk factors for different diet-related chronic diseases, is an important health strategy, which should be reflected in FOPL and members agreed this was beneficial.

FOPL should help consumers cope with their product purchases and enable them to select healthy food choices. However consumers may "give up" trying to comprehend FOPL if it is not clear, concise and easily understood and comparative across the whole food supply or within a food category.

NCW NZ thanks the New Zealand Food Safety Authority for the opportunity to comment on this consultation paper and look forward to the outcomes of the discussion.

Elizabeth Bang
National President

Jan Brown
Convener, Consumer Affairs Standing Committee