

ARA X NRA SUBMISSION

PRELIMINARY POSITION PAPER ON THE NUTRITION INFORMATION PANEL (NIP)

NOVEMBER 2025

The Australian Retailers Association (ARA) and National Retail Association (NRA) welcome the opportunity to contribute to the Food Standards Australia New Zealand (FSANZ) Preliminary Position Paper Nutrition Information Panel Review (PPP NIP Review).

The ARA and the NRA (the Associations), which propose to amalgamate to form the Australian Retail Council (ARC), represent a \$430 billion sector, and employs 1.4 million Australians – making retail the largest private sector employer in the country and a significant contributor to the Australian economy.

Our membership spans the full spectrum of Australian retail, from family-owned small and independent retailers that make up 95% of our membership, through to our largest national and international retailers that employ thousands of Australians and support both metropolitan and regional communities every day.

A strong retail sector delivers widespread benefits to all Australians, with a significant portion of every dollar spent in retail flowing back into employees, suppliers, superannuation funds, and local communities. We are united in advocating for the policy settings, reforms and collaboration that will drive growth, resilience, and long-term prosperity for Australian retail and the millions who rely on it.

EXECUTIVE SUMMARY

The Associations welcome the opportunity to comment on FSANZ's review of the Nutrition Information Panel (NIP). Further, we support clear and trusted nutrition labelling that enables consumers to make informed purchasing decisions.

The majority of Australians recognise the value of the current NIP. However, there is further opportunity to strengthen consumer understanding, particularly regarding the role of carbohydrates, including sugars and dietary fibre. To that end, the Associations support retaining the existing NIP format and structure for pragmatic reasons, while recommending a number of targeted improvements to enhance clarity and maintain alignment with international (Codex) guidance.

This submission builds on the feedback previously provided to FSANZ on the Health Star Rating and Nutrition Information Panel in October 2024 and January 2025. The comments below respond to the review based on the NIP as it currently operates.

RESPONSE TO THE PRELIMINARY POSITION PAPER

The Associations support the continued provision of clear nutrition information on both the front and back of packaging. FSANZ's own research shows that the current panel is trusted by a majority of Australians. However, this also highlights an opportunity to improve comprehension for the one third of consumers who do not consider it important or do not fully understand the information currently displayed. Strengthening the clarity and consistency of the panel will help ensure consumers can compare products with confidence across different formats and retail environments.

We support FSANZ's proposal to retain the current tabular format, including the existing columns and the order and grouping of nutrients. This format is familiar to consumers and works effectively in both physical and online retail settings. To further support understanding, the Associations recommend replacing the use of the dash currently used to display subcomponents with the clearer phrase "of which". Codex Alimentarius Guidelines on Nutrition Labelling (sections 3.4.6 and 3.4.7) recommend this approach to indicate that sugars are a component of total carbohydrates and saturated fatty acids are components of total fat. We consider that this change could be implemented voluntarily over time through routine label updates without imposing additional regulatory burden.

The Associations support retaining mandatory declaration of servings per package, serving size and quantities per serving as these elements are fundamental to consumer understanding of portion size and comparability across products. We also support maintaining voluntary percentage daily intake and percentage recommended dietary intake information. While voluntary inclusion acknowledges space and design constraints on pack, standardisation of this information in online environments would improve consistency for consumers where space limitations do not apply.

Consumer understanding of carbohydrates remains comparatively low when compared with other nutrients. Findings from Proposal P1058 on added sugars indicate confusion about the relationship between sugars, starches and total carbohydrates, which can lead to unwarranted focus on sugars despite population intake now sitting within the World Health Organization recommendation of no more than ten per cent of energy intake. Codex guidance (section 3.2.4) also provides for the declaration of starch and other carbohydrate constituents where useful to consumers. In this context, the Associations do not support retaining the current list of included nutrients without adjustment.

We recommend allowing optional declaration of both dietary fibre and starch within the carbohydrate section of the panel and replacing the dash for subcomponents with the phrase “of which”. These changes would improve transparency of this important macronutrient, reduce consumer confusion and better reflect the structure of the Health Star Rating system. Implemented voluntarily through routine label updates, this would represent a low-cost, evidence-based improvement.

We support retaining the current terminology for nutrient declarations and the existing metric units used to express average quantities, noting that both are aligned with Codex guidance. We also support maintaining current legibility requirements for pragmatic reasons.

Finally, as more Australians purchase food online, the Associations support ongoing consideration of how nutrition information can be presented consistently in digital retail environments, so consumers can continue to access the information they need before making a purchase. This should remain proportionate and flexible, explicitly recognising digital information pathways such as QR codes, 2D barcodes and microsites as valid mechanisms for providing supplementary information. While accountability for the accuracy of this information lies predominantly with product originators, retailers understand that a suitable model that minimises risks for all stakeholders needs to be developed and supported by practical transition arrangements when label updates occur.

RECOMMENDATIONS

The Associations recommend that FSANZ:

1. Retain the current tabular design, including the existing layout, columns, headings and the order and grouping of nutrients.
2. Replace the use of the dash for subcomponents of total carbohydrates and fats with the clearer phrase “of which”, consistent with international guidance, implemented voluntarily through routine label updates.
3. Retain mandatory display of servings per package, serving size and quantities per serving to support product comparison and portion awareness.
4. Continue to allow voluntary declaration of percentage daily intake and percentage recommended dietary intake information, recognising practical label constraints.
5. Update the list of nutrients permitted within the carbohydrates section to allow optional declaration of:
 - a. dietary fibre, and
 - b. starch

to improve consumer understanding of this macronutrient and better support the Health Star Rating system.

6. Retain current terminology for nutrient declarations and the existing metric units used to express average quantities.
7. Maintain current legibility requirements for pragmatic reasons.

Support a proportionate and flexible approach to presenting nutrition information when foods are sold online, ensuring consumers can access essential information prior to purchase without duplicating physical labelling requirements.

These targeted changes are low cost for industry to implement over time, align with Codex guidance and Health Star Rating requirements, and improve clarity and consumer understanding without adding unnecessary regulatory burden.

CONCLUSION

The Associations welcome FSANZ's focus on enhancing the effectiveness of the Nutrition Information Panel. The current panel plays an important role in helping Australians make informed dietary choices, and with targeted improvements it can continue to support positive public health outcomes while maintaining a proportionate and pragmatic regulatory approach.

The changes we recommend are modest in scope yet meaningful in impact. They are informed by consumer insights, aligned with Codex guidance and consistent with the Health Star Rating system. They also reflect how Australians increasingly engage with food labels across both physical and digital channels. Introduced voluntarily over time through routine label updates, these refinements would minimise transition costs for industry while supporting clearer, more trusted nutrition information for consumers.

The Associations look forward to continued collaboration with FSANZ, government and industry partners to ensure that nutrition information remains accessible, accurate and fit for purpose in a modern retail environment.