

Response ID ANON-PYNK-Z6F8-G

Submitted to NIP review preliminary position response form

Submitted on 2025-11-28 10:47:12

How to provide your response

The survey response form includes four sections.

Publishing a summary of what we've heard and consent to collect personal information

I consent to the collection of personal information in this online survey form.:

Yes

About you

Full name

Full name:

Emma Shields

Email address

Email address:

emma@cancer.org.nz

Contact person

Full name:

Emma Shields

Email address:

emma@cancer.org.nz

Submitter type

Organisation - please write your organisation name in the box below.

Enter initials if you are an individual, or enter your organisation name:

Cancer Society of New Zealand

Which group do you most identify with?

Not-for-profit organisation

If other, please specify::

If you wish to provide general background information about yourself or your organisation (if any), include this in the box below.

General background information about you or your organisation:

Your response

Have you read the preliminary position paper?

Yes

Please provide your response to the preliminary position paper in the box below.

Any other information:

1. We agree with FSANZ's preliminary position that the NIP continues to largely meet its intended purpose and no regulatory changes to the Code are necessary at this time.

2. We do however recommend that the NIP undergo some improvements to better protect and promote public health outcomes and consumers' interests.

3. Added sugar labelling

3.1 Our key priority for the NIP, which can and should be considered outside of this broader NIP Review, remains incorporating added sugar labelling.

3.2 The lack of added sugar information in the NIP is inconsistent with current food policy, undermines informed consumer choices, and prevents the use of added sugars in other relevant policies and programs.

3.3 This change to the NIP would allow Australians and New Zealanders to choose products in alignment with official dietary guidance, support policy guidelines and other directions set by Food Ministers in recent years, and help FSANZ achieve its legislated public health and consumer objectives

3.4 We look forward to re-engaging with FSANZ, as well as Food Ministers and jurisdictional agencies, on Proposal P1058 (Nutrition Labelling About Added Sugars).

4. Online labelling

4.1 We are pleased to see the Food Regulation Standing Committee progress work on online labelling. We strongly recommend that this policy work be translated into regulatory requirements to display equivalent information to consumers prior to purchase, regardless of setting, as soon as possible. As part of this, consideration must be given to ensuring such information is readily visible and legible to users.

5. Digital labelling

5.1 We understand that FSANZ is planning to assess digital (i.e. off label) provision of information. We are concerned with the potential for any mandatory health and nutrition information to be allowed to be removed from product packaging and instead displayed in a digital forum accessible through technology (e.g. via QR codes).

5.2 Any moves in this direction may further alienate consumers from health/nutrition labelling and literacy, entrench health inequities, and facilitate marketing opportunities on- and off-pack.

5.3 We do support, however, FSANZ regulating the content that can be displayed digitally, when linked from product packaging, so that only regulated content can be shown to shoppers; this will help ensure that consumers are not further bombarded with distracting, confusing or misleading marketing material.

References and supplementary data or information

You may upload a supporting document here.:

NIP Review Submission CSNZ 20251124.docx was uploaded

Confidential information

Do you wish to provide confidential information as part of your response?

No

Feedback

What is your level of satisfaction using FSANZ's Consultation Hub to complete your submission?

Satisfaction level - Guidance provided to make your submission:

Satisfied

Satisfaction level - Using the Consultation Hub:

Satisfied

Satisfaction level - Time and effort:

Satisfied

Satisfaction level - Overall satisfaction:

Satisfied

If you wish to explain your responses, please do so below.: