

17 April 2018

Ministry of Primary Industries
PO Box 2526
WELLINGTON

By email

Comments on labelling of fats and oils

Introduction

Thank you for the opportunity to provide comment on the current labelling of fats and oils. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

Contact: Aneleise Gawn
Consumer NZ
Private Bag 6996
Wellington 6141
Phone: 04 384 7963

Responses to questions

In the time available for providing comment, we have focused our responses on questions 1, 2 and 4.

Question 1: Do the current labelling requirements provide adequate information for consumers to be able to make informed choices in support of dietary guidelines? Please provide information to support your response.

We do not consider current labelling requirements provide adequate information for consumers to make informed choices consistent with dietary guidelines.

Labelling of fats and oils

As recommended by the Labelling Review (recommendation 12), we consider labelling should require manufacturers to identify the specific fats and oils used in their products. Providing this information will assist consumers make choices consistent with dietary guidelines, which recommend reducing intakes of saturated fats.

The current situation, where the generic name "vegetable oils" can be used, is not helpful for consumers and is potentially confusing. As the Labelling Review noted, consumers may assume "vegetable oil" means the product is a healthier choice when this may not be the case. Several vegetable oils, such as coconut and palm oil, are high in saturated fat.

Requiring oils to be labelled in the ingredient list would not only better align food labelling rules with dietary guidelines but assist consumers to make better choices about packaged foods.

Information on trans fat

We also consider labelling should require trans fatty acids to be listed in the nutrition information panel, as recommended by the Labelling Review (recommendation 13).

New Zealand's healthy eating guidelines advise combined intake of saturated and trans fats should be no more than 10 percent of total energy intake. However, trans fats are not required to be labelled, making it difficult for consumers to choose packaged foods consistent with this advice.

We note monitoring of trans fat in the food supply has found New Zealanders obtain on average 0.6 percent of their daily energy intake from trans fats. However, recent Australian research found there is no clear evidence of a consistent reduction in trans fats in foods surveyed.¹

The research, commissioned by the Australian Heart Foundation, found in some categories median trans fats had increased by 150 percent or more. In other categories, levels appeared to fluctuate during the period surveyed (2005 to 2013).

Given New Zealand has a similar food supply chain, this information is relevant to the domestic market.

Question 2: What views do consumers have on the health impacts of different fats and oils, and to what extent do these views align with the advice in the dietary guidelines? Please provide any evidence you have in support of your response.

Our research has found strong consumer support for the labelling of added fats and oils.

For example, many consumers want to avoid palm oil for both health and environmental reasons. In our recent survey (December 2017), 68 percent of consumers supported mandatory labelling of palm oil.² Results are shown in the table below.

Table 1: Palm oil labelling

Palm oil labelling should be mandatory	68%
Palm oil labelling should not be mandatory	8%
No preference	9%
Undecided	15%
Total	100%

Question 4: Do consumers consider information on fats (such as the nutritional profile or source) when making purchasing decisions? Please justify your response and provide any evidence you have in support of your response.

Consumers are increasingly looking for information about the health impacts of foods they're buying. The findings of our survey research show consumers want

¹ Sax Institute for The National Heart Foundation of Australia, 2017, *Levels of trans fats in the food supply and consumption in Australia*, https://www.heartfoundation.org.au/images/uploads/main/For_professionals/Expert-Commentary-Levels-of-trans-fats-in-the-food-supply-and-consumption-in-Australia.pdf

² Survey results are based on a nationally representative sample of 1022 New Zealanders, aged 18 years or older.

readily available information on the nutrients in packaged food to help make better purchasing decisions.

In July 2016, we carried out a survey on the health star rating system.³ A majority of respondents in the survey felt ratings should be mandatory on foods with high levels of sugar, fat or sodium.

The survey also found consumers who were using the star ratings were more likely to look at additional information on the pack such as the ingredients list (60 percent) and the nutrition information panel (69 percent).

Survey research by our Australian sister organisation Choice has also found strong consumer support for labelling information.⁴

Thank you for the opportunity to provide comment. If you require any further information on the points raised, please do not hesitate to contact me.

Yours sincerely

Aneleise Gawn
Consumer advocate

³ Survey results are based on a nationally representative sample of 530 New Zealanders, aged 18 years or over.

⁴ Choice has outlined this research in its submission to the Food Regulation Standing Committee.