

November 2020

Re: Combined submission from NAQ Nutrition Training and Nutrition Australia – Review of the Food Standards Australia New Zealand Act 1991- Scoping paper for public consultation

The scoping paper asks for feedback on five key areas of FSANZ current structures: Objectives, Functions, Legislative processes and decision-making arrangements, Partnerships, and Operations. It also asks for feedback on 25 proposed reform areas. Further information on these topics can be found in the [Scoping Paper](#).

Key points raised by NAQ Nutrition Training and Nutrition Australia are as follows:

- There is still a need for FSANZ to be regulating food as a means of keeping Australian's safe. This process should be streamlined and consistent for all stakeholder's (industry, public health organisations, and consumers). FSANZ should have a broader role in assessing health claims and regulating food to encourage consistency.
- The regulation of food should consider not only the short term impacts of food intake (illness through food safety) but also the long term impacts of food intake (diet related disease including overweight and obesity, heart disease, type 2 diabetes and cancer). Part of food regulation should be to promote population health.
- The current FSANZ system is reactive rather than proactive, responding mostly to industry submissions and concerns from industry partners who have a paid subscription. Taking a more proactive approach could include activities such as regularly checking on how foods are marketed or sold, undertaking studies on how consumers interpret product information or collaborating with other agencies to tackle multiple issues (instead of looking at them in silos).
- We encourage FSANZ to undertake more regular and holistic reviews of food standards as this would allow the food standard to reflect the most current scientific evidence, best food safety practice and dietary guidelines.
- FSANZ should consider reframing and streamlining their functions to allow for a more effective but comprehensive response to requests and concerns. FSANZ should have a clear structure of roles and responsibilities to allow for triaging.
- There should be a separate pathway for public health professional, key stakeholders and consumers to raise public health concerns within the food regulatory system to ensure that they are looked at in a timely manner.
- Inconsistent monitoring of health claims can lead to potentially misleading claims which creates confusion amongst consumers. In the long term this can contribute to mistrust in the system and health claims may be viewed with suspicion.
- FSANZ could consider clearer and more streamlined communication channels to better explain the functions of the organisation and direct consumers to relevant information.
- FSANZ should consider building partnerships and collaborating with key public health stakeholders to better understand the risks, outcomes and barriers and to deliver a unified message to the consumers. This includes developing a clear, practical and timely pathway for public health stakeholders to request reviews.