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## RESPONSE TO FOOD STANDARDS AUSTRALIA NEW ZEALAND'S PRELIMINARY POSITION ON THE NUTRITION INFORMATION PANEL REVIEW

The George Institute for Global Health appreciates the opportunity to respond to Food Standards Australia New Zealand's (FSANZ's) preliminary position on the Nutrition Information Panel (NIP) review. This submission builds on our response to FSANZ's call for information on the Health Star Rating (HSR) and NIP in January 2025.

We agree that the NIP does not require significant changes and largely meets its intended purposes. As such, **we welcome FSANZ's proposal to discontinue the NIP review.**

However, several important issues affecting consumer use and understanding of the NIP, transparency and accountability for industry, and other initiatives to protect and promote public health remain unresolved. **Measures to address these concerns can, and should, be further progressed by FSANZ separate to the NIP review.** We note that the evidence used to maintain the status quo on these issues has largely not been made available in sufficient detail as yet. Greater transparency around the processes and inputs underpinning any decisions will support trust and confidence in the food regulatory system.

**Our key priority for the NIP remains the mandatory reporting of added sugars content.** Without this change, consumers cannot make informed choices or follow Australian and New Zealand dietary guidance regarding added sugars. Policy options to target and reduce added sugars intakes will also remain limited, while previous Ministerial directions will continue to go unmet. The George Institute will look to re-engage with FSANZ, Food Ministers and jurisdictional agencies on Proposal P1058 (Nutrition Labelling About Added Sugars).

Other outstanding issues previously raised by public health and consumer stakeholders regarding the NIP include:

- Mandatory reporting of trans fats and dietary fibre content, amongst other potential additions to the NIP

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- Salience and legibility of the label
- Voluntary use of potentially misleading and confusing information (e.g. %DI/RDI, calories instead of kilojoules, and other nutrient declarations)
- Ability to set serving sizes and 'as prepared' values that do not represent actual behaviours
- Lack of guidance or transparency regarding tolerances and variability for values reported in the NIP
- Demonstrated potential for health, nutrition and generic product claims to interfere with consumer use and understanding of the NIP

Although FSANZ's Preliminary Position Paper references some of these issues, it does not always reflect or respond to our concerns, for example regarding the preferential use of calories in product marketing and packaging by industry. Other issues we raised, such as regulatory tolerances for variability in values reported, were not reported altogether. The next steps for issues flagged by FSANZ as outside of or broader than the scope of the NIP Review, such as label legibility, also remain unclear.

We welcome the work on online labelling progressing via the Food Regulation Standing Committee. We strongly recommend that any policy guidelines supporting the provision of health and nutrition information to consumers prior to purchase online be translated into regulatory requirements as soon as possible. The George Institute will submit a response to the current public consultation in support of this.

Finally, we reaffirm our opposition to any proposals to remove health and nutrition information from physical packaging, including through digital labelling initiatives. We support regulating digital platforms to limit the potential for additional marketing or other potentially confusing or misleading material to be displayed, however. The George Institute will continue to engage in these discussions to ensure consumers retain access to health and nutrition information on packaging and are protected from further marketing and distracting tactics by the food, beverage, and alcohol industries on digital platforms.

Kind Regards  
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