

SUBMISSION

28 November 2025

AMA submission: Food Standards Australia New Zealand's preliminary position on the Nutrition Information Panel Review [draft]

Submitted via: <https://consultations.foodstandards.gov.au/fsanz/nip-review-preliminary-position-response-form/>

The Australian Medical Association strongly endorses the importance of nutritional education and food literacy in supporting Australians to make healthier food choices. Education and awareness campaigns should seek to promote simple, easy to understand messages around healthy eating. The Nutrition Information Panel (NIP) can enhance health literacy and consumer knowledge.

We welcome the opportunity to comment on the Preliminary Position [Paper](#) on the Nutrition Information Panel (NIP) Review prepared by Food Standards Australia New Zealand (FSANZ) and note the AMA [submission](#) made in December 2024 to the call for information on the NIP and Health Star Ratings (HSR).

The AMA agrees that the NIP does not require significant changes and largely meets its intended purposes. It provides useful, detailed nutrition information to consumers, an important platform for monitoring and accountability, and the basis of many initiatives to improve the healthiness of individual products and food environments.

The NIP could be improved somewhat to better protect and promote public health outcomes and consumers' interests, and these improvements are outlined below. These can and should be resolved through other active and future FSANZ workstreams, as noted below, and do not need to proceed under the NIP Review. Introduction of modifications to the NIP could occur alongside review of the HSR System and upgrade to mandatory participation by Industry. This would improve the feasibility of commercial packaging changes. The rationale outlined in the Preliminary Position Paper does not support inaction on these important changes that would benefit consumers and other stakeholders.

Related issues for consideration

Voluntary information

The AMA is concerned that the inclusion of voluntary information in the NIP, such as %DI/RDI values, calories instead of kilojoules, and other non-essential nutrient declarations, has the potential to mislead or confuse consumers. FSANZ's own consumer research highlights the importance of a consistent format for nutrition information. The AMA recommends removing voluntary inclusions, as

the rationale for their continued use is not supported by evidence as provided in the Preliminary Position Paper.

Added sugar labelling

A key opportunity for the NIP, and one that should be advanced independently of the broader NIP Review, is the incorporation of added sugar labelling. The absence of added sugar information in the NIP is out of step with current food policy, undermines informed consumer choice, and limits the effectiveness of other policies and programmes that rely on this data. Including added sugars in the NIP would empower [Australians](#) and [New Zealanders](#) to make choices aligned with official dietary guidance, support policy [directions](#) set by Food Ministers, and help FSANZ meet its [public health and consumer protection objectives](#).

Food Ministers have already [acknowledged](#) the current sugar labelling does not provide adequate context for consumers. FSANZ's own work has found [no technical barriers](#) to quantifying added sugars in the NIP, yet the Preliminary Position Paper offers no substantive evidence for not proceeding. Given the evidence to date, there is no justification for abandoning this priority. The AMA looks forward to re-engaging with FSANZ, Food Ministers, and jurisdictional agencies on Proposal [P1058](#) (Nutrition Labelling About Added Sugars).

A public health priority for the NIP, which can and should be considered outside of this broader NIP Review, should remain work incorporating added sugar labelling.

Inclusion of dietary fibre in the NIP

To support monitoring and enforcement of a mandatory HSR System, the AMA continues to advocate that dietary fibre should be required to be displayed in the NIP. This could be implemented as part of, and alongside, processes for mandating the HSR System.

Future improvements

The AMA advocates strongly that other matters raised by public health and consumer stakeholders during the NIP review, including issues such as label salience and visibility, the use of serving sizes, tolerance for values, and the potential for claims to interfere with consumer use and interpretation of the NIP, should be noted for future action as appropriate. This ensures that this work is not at risk of industry-capture and remains focussed on bettering public health outcomes.

Evidence and transparency

Given the importance of many of the issues raised by the NIP Review to public health and consumer outcomes, the AMA believes it would be valuable to have access to the detailed methodologies and results of the work undertaken by FSANZ to underpin the Preliminary Position Paper as well as any final report to Food Ministers. This will help ensure trust and confidence in FSANZ's processes and decisions, especially amongst stakeholders who are vital to the public understanding of tools such as the NIP.

Online and Digital Labelling

The AMA welcomes progress to online labelling and strongly recommends that policy work be translated into regulatory requirements to ensure consumers have access to equivalent information before purchasing, regardless of setting. Information must be visible and legible. While digital (off-label) provision of information is being considered, the AMA remains concerned about any move to remove mandatory health and nutrition information from packaging in favour of digital-only access. Such changes risk alienating consumers, entrenching health inequities, and increasing exposure to marketing. Should digital content be linked from packaging, it must be strictly regulated to ensure only approved information is shown, protecting consumers from misleading marketing.

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