



Submission

Inquiry into Food Standards Amendment (Truth in labelling – Palm Oil) Bill 2009

National Heart Foundation of Australia

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To:
Selection of Bills Committee
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The Heart Foundation understands that the Food Standards Amendment (Truth in Labelling - Palm Oil) will amend product information standards to provide for the accurate labelling of palm oil in food.

Background

The National Heart Foundation of Australia (Heart Foundation) understands that the Senate on recommendation of the Selection of Bills Committee referred the Food Standards Amendment (Truth in Labelling - Palm Oil) to the Community Affairs Legislation Committee for inquiry and report by 15 June 2010.

The Bill will amend product information standards to provide for the accurate labelling of palm oil in food. The Committee is seeking information on addressing the following issues:

1. The rights of consumers to be provided with accurate and truthful information to enable them to make an informed choice about the food products they are eating and purchasing;
2. That allowing palm oil to be listed as 'vegetable oil' on food packaging is misleading to consumers;
3. That palm oil is considered high in saturated fats and consumers should be made aware if it is used in foods they are eating for health reasons;
4. That the impact of palm oil production on wildlife, specifically Orang-utans in South East Asia is significant unless it is done sustainably;
5. That sustainable palm oil can be produced with low impact on the environment and wildlife and with better labour laws on plantations; and
6. That manufacturers should be encouraged to use sustainable palm oil in their production process and can subsequently use the status of 'Certified Sustainable Palm Oil' as a business benefit.

About the Heart Foundation

The Heart Foundation is a non-profit, non-government health organisation (NGO) which undertakes activities including health promotion and educational activities, support of research and the Tick Food Information Program. The Heart Foundation supports regulatory provisions that help the food industry produce and market products that assist people to achieve healthier eating patterns, with due consideration given to safety.



The Heart Foundation believes it is nutritionally desirable and preferable that the reliance of palm oil in food production is minimised.

Introduction

The Heart Foundation in this submission has limited its comments to those that pertain to nutrition quality and labelling issues (points 1, 2, 3, and 6) and not to issues relating to sustainable agricultural practices and the environment (points 4 and 5).

The Heart Foundation is best equipped to answer questions relating to nutrition and food product labelling as it has been advocating for improvements in our food supply for many years. One of the priorities of the Heart Foundation, as per our Strategic Plan *Championing Hearts*, is to improve healthy eating by improving the **food supply** from paddock to plate: this includes the nutritional quality of the food available, food growing, ordering and serving practices and the promotion of healthier food. We rely on a strong evidence-base, generated by our policy teams and informed by industry and government nutrition guidelines.

With regard to the environment and impact of agricultural practices, the Heart Foundation acknowledges community concern regarding destruction of rain forests and animal habits, as a result of palm tree farming and palm oil production, and supports efforts to achieve sustainable palm oil production. The Heart Foundation believes it is nutritionally desirable and preferable that the reliance of palm oil in food production is minimised.

Palm oil is known for its high saturated fat content. Given the adverse effect of the intake of both saturated fats and trans fats on the risk of developing cardiovascular disease, and that these fatty acids are commonly present together in the food supply, the Heart Foundation focuses on limiting **both** saturated and trans fats in our food supply **together** rather than just a focus on one. Our position is aimed at reducing the risk of chronic disease, including heart disease and stroke to all Australians.



Issues for Discussion

Issue 1: The rights of consumers to be provided with accurate and truthful information to enable them to make an informed choice about the food products they are eating and purchasing.

Consumers' expectations are that statements on food labels are true and accurate.

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In Australia, the food standards are set by The Food Standards Australia and New Zealand (FSANZ) which primary objectives are to: protect public health and safety; to provide consumers with sufficient information to make informed choices; and to prevent misleading and deceptive conduct ¹.

The issue of prevention of misleading deceptive conduct is further strengthened by consumer protection laws such as the Trade Practices Act 1974 which is enforced by the Australian Competition and Consumer Commission (ACCC).

The Heart Foundation supports regulatory provisions that

- a) help consumers make informed decisions about foods, such as the provision of accurate nutrition information on food labels, and***
- b) the food industry produces and market products that assist people to achieve healthier eating patterns.***



Issue 2: That allowing palm oil to be listed as ‘vegetable oil’ on food packaging is misleading to consumers.

Current Food FSANZ Requirements

The Heart Foundation understands that ‘palm oil’ is not legally required to be specifically listed as such but can be described generically as ‘vegetable oil’ on the food label list of ingredients, according to FSANZ Code.

Under the current FSANZ Code, Standard 1.2.4 - Labelling of Ingredients, it contains specific requirements regarding labelling and naming of ingredients. Ingredients, according to clause 4, must be declared in the *statement of ingredients* by common, descriptive or generic name. Where applicable, a generic name as set out in table to clause 4 is permitted.

Specific to the generic term ‘fats or oils’, the conditions for use are that:

- 1. must be qualified as to whether the source is animal or vegetable*
- 2. where the source of vegetable oil is peanut, soybean or sesame the specific source name must be declared*
- 3. in the case of dairy products, including ice cream, the source of animal fats or oils must be specifically declared*
- 4. must not be used for diacylglycerol oil.*

In food manufacture availability of ingredients, such as vegetable oils, may be variable and the current labelling requirement provides the food industry with some flexibility with ingredients.

In the FSANZ User Guides to the New Food Standards Code², it outlines that providing more information can be better than less information on a label as consumers often look for particular products. In addition it states that generally manufacturers should aim to represent a food with specific source of origin. However, when the manufacturers state the source, they must be sure that the food is from that source and that it is only from that source. Further to the above labelling requirement, a mandatory nutrition information panel (NIP) on food labels is required on the majority of packaged foods (except where they are exempt) as per Standard 1.2.8 Nutrition Information Requirements.

Manufacturers are required, for packaged foods, to declare average quantities per serve and per 100g or 100ml for energy, protein, total fat, saturated fat, total carbohydrate, sugars and sodium in a prescribed panel format.



The Need for Mandated Palm Oil Labelling?

The Heart Foundation is encouraged to see this proposed Bill bring attention to foods that are high in saturated fat, such as palm oil.

It is encouraging to see, via this proposed Bill, that attention is being given to foods that are high in saturated fat, such as palm oil, given the adverse effect of the intake of saturated fat on the risk of developing cardiovascular disease.

While this Bill proposes to mandate only palm oil labelling on food packaging, the Heart Foundation advocates for full disclosure of all fats and oils on labels across the food supply, including food purchased outside the home.

The Heart Foundation contends that it is important to assist consumers to make better choices in foods that contribute significantly to the fat content of the diet. Therefore we are supportive of regulatory amendments that enable more effective communication to consumers about food products that are sources of mono- and/or polyunsaturated fats as this would assist consumers in improving the balance of unsaturated to saturated fats in their diets, which is associated with better heart health.

Our research³ tells us that consumers experience confusion between healthier and less-healthy fats and oils. In addition, other consumer research⁴ on nutrition labelling indicates that labelling alone is limited as a strategy to improve the nutritional status of a population. One reason is poor nutrition knowledge that reduces the ability of consumers to interpret the NIP. Using the information on a label suggests that consumers recognise and know what each nutrient and amount means and that they understand the link between different nutrients, and the role these nutrients have in the body and healthy eating. While at the same time it assumes consumers can locate the NIP and ingredients list, will look at it, read it, and are able to interpret it in order to make an informed decision about a food purchase.

If an amendment to FSANZ labelling standards were to occur, the Heart Foundation recommends

- a) all fats/oils be declared in the ingredients list,
- b) declaration of trans fat in the NIP, and
- c) FSANZ code be extended to the foodservice sector i.e. food made and packaged on premises from which it is sold, food packaged in the presence of the purchaser, and food that is delivered packaged, ready for consumption at the express order of the purchaser.



The Heart Foundation believes that labelling all fats types will

- a) assist consumers in understanding that there are different types of fats, and
- b) not disadvantage those products which may have overall a healthy fat profile (i.e. high in unsaturated fats) as they contain largely unsaturated fat with a small proportion of palm oil, such as trans free margarine spreads. Consumers may view these products as unhealthy if only palm oil is disclosed.

The Heart Foundation does acknowledge that full disclosure of all fats and oils may reduce the flexibility currently permitted to industry resulting in greater costs for industry, and potentially consumers.

The Heart Foundation overall believes that the Bill is important as it helps to highlight the problem with fats and oil sources in our food supply which are high in saturated fat.

This Bill would be a first step to helping the community understand which foods contain palm oil but that it will be important that further community education is undertaken to ensure that people understand the other high saturated fat sources (e.g. tallow, coconut oil, etc) and that the Heart Foundation would be very keen to see a comprehensive approach including nutrition and labelling education strategies taken across the whole food supply chain.

Australians are eating at least twice the amount of saturated fat recommended by the HF. This is a concern to the Heart Foundation since saturated fat raises blood cholesterol levels – a risk factor for heart disease.

Issue 3: That palm oil is considered high in saturated fats and consumers should be made aware if it is used in foods they are eating for health reasons.

Palm oil and its fractions (palm olein and palm stearin) are high in saturated fat content (approx 45% and 60%, respectively) ⁵.

Australians are eating at least twice the amount of saturated fat recommended by the HF⁶. This is a concern to the Heart Foundation since saturated fat raises blood cholesterol levels – a risk factor for heart disease.

Evidence for reducing saturated fat and trans fat intake

The Heart Foundation has recently reviewed the evidence for dietary fats and dietary cholesterol⁶ and the findings are largely upheld with advances in nutritional science leading to:

- reconfirmation that saturated fat is associated with coronary heart disease
- re-confirmation that saturated fat should be replaced with unsaturated fats in order to reduce the intake of saturated fat,
- re-confirmation that omega-6 polyunsaturated fat intake lowers LDL cholesterol,
- The CVH benefits of omega-3 polyunsaturated fat are not influenced by background of omega-6 polyunsaturated.
- stronger evidence for the negative impact on trans fats on cardiovascular health (CVH),

The evidence found that by replacing saturated fat with polyunsaturated or monounsaturated fat in the diet, there is a positive influence on cardiovascular risk compared to replacing with carbohydrate. In fact, lowering saturated fat intake to less than 7% of energy intake resulted in better outcomes than previous recommendations to lower intake to less than 10% of energy.

The Heart Foundation recommends people choose foods containing unsaturated rather than saturated fats. Intakes of polyunsaturated fats by adults⁷ and children⁸ fall short of achieving the Dietary Guidelines of 6-8% polyunsaturated fats⁹ and the Heart Foundation's recommendation of higher intakes of 8-10% ⁶.



Heart Foundation recommendations to Industry

The Heart Foundation advocates for the food industry (food retailers, food manufacturers, food ingredient suppliers) to source alternative fats and oils with healthier fat profiles i.e. higher unsaturated fat content to replace palm oil.

In order to achieve the optimal intake of polyunsaturated and monounsaturated fats to reduce cardiovascular risk, the HF recommends an emphasis on saturated fat reduction, and replacement of saturated fats with unsaturated fats (to achieve a ratio of PUFA to SFA of greater than 1), rather than reducing all fats⁶.

The Heart Foundation acknowledges that replacing highly saturated fats and oils, such as palm olein and palm stearin, with healthier alternatives is complex given the functionality that the saturated fat provides in baked goods, and to a lesser degree in deep frying oils. It involves research and development, product reformulation, and consumer acceptance testing, etc.

Nevertheless, for the nutrition and health issues outlined above, the Heart Foundation advocates for the food industry (food retailers, food manufacturers, food ingredient suppliers) to source alternative fats and oils with healthier fat profiles i.e. higher unsaturated fat content. And, in addition to replace high saturated fat oils and fats, such as palm oil, with unsaturated fats and oils, such as canola, safflower, sunflower, etc.

The food industry needs to be encouraged to make changes to the food supply in order to improve the cardiovascular health of Australians by:

- reformulating foods to reduce saturated and trans fats by replacing with cis-unsaturated fats;
- using ingredients and products with negligible trans fats but not at the expense of increasing saturated fats,
- Replacing partially hydrogenated or hydrogenated oils with oils high in cis-unsaturated fats.



Use of Consumer Food Messages

The Heart Foundation recommends people choose foods that are higher in unsaturated fats⁶ and has developed food-based recommendations¹⁰ to assist consumers to understand how to choose healthier foods.

A key message from health professionals, dietary guidelines and many other credible sources, is the importance of consuming the correct types of dietary fats. The Heart Foundation recommends people choose foods that contain unsaturated rather than saturated fats⁶ and has developed food-based recommendations¹⁰ to assist consumers to understand how to choose healthier foods.

These messages were developed from a number of model diets based on our saturated fat (SFA) and polyunsaturated fat (PUFA) recommendations. An energy level of 8700 kJ/day, SFA < 7% of total energy or SFA+trans < 8% of total energy was adopted for modelling. A number of manipulations of the model diet were conducted using key foods to determine if and how frequently they could be included in the diet to still meet SFA and PUFA recommendations. The model diets, 14 in total, were analysed using NUTTAB 2006 and the RMIT fatty acid databases plus additional relevant dietary models for macronutrients, micronutrients and fatty acids. These analyses were then compared with the current nutrient reference values (NRV) to ensure nutrient adequacy.

From this modelling, it was determined that the recommendations for achieving optimum balance of fatty acids in the diet are difficult to reach without an increase in the use of foods high in the healthy unsaturated fats such as oils, margarine spreads, salad dressings made using unsaturated oils, and nuts and seeds¹¹.

Some examples of our key healthy eating and drinking messages to consumers regarding fats and oils include:

Use spreads and margarines made from canola, sunflower or olive oil and dairy blends that have earned the Heart Foundation Tick instead of butter.

Choose from a variety of vegetable and seed oils when you are preparing food. Healthier choices include canola, sunflower, soybean, olive, sesame and peanut oils.

Use salad dressings and mayonnaise made from canola, sunflower, soybean, olive, sesame and peanut oils.



Heart Foundation recommendation to Governments

1) Develop a comprehensive, national, whole of government food policy

Heart Foundation recommendations to Governments

- **Develop a comprehensive, national, whole of government food policy.**

The Heart Foundation believes that food labelling requirements in Australia should be informed from a **comprehensive, national, whole of government food policy**.

At present Australia does not have such a policy, and in its absence there is no policy framework to guide clear food labelling decisions and Government decisions in relation to foods. A Food Policy would articulate the way in which Government plans to deal comprehensively with food issues.

Government needs to address the pressing health issue of reducing saturated and trans fat intake in the Australian diet, and the mix of regulatory (e.g. mandatory saturated and trans fat labelling, health claims for saturated/trans fat and cardiovascular disease, nutrient claims e.g. low saturated fat) and non-regulatory strategies (e.g. saturated fat voluntary targets for food industry, social marketing messages about chronic disease and saturated fat) that would be required to achieve a halving of saturated fat intake.

- **An overarching plan of regulatory and Non-regulatory strategies to reduce saturated and trans fat intake.**

Without the driver of an overarching Government Food Policy to inform decisions, nutrition issues such as trans fat labelling are debated in the public domain with minimal comment from Government.

With the release of the FSANZ review of trans fat intake in Australia and New Zealand ¹², the Ministerial Council approach regarding labelling of trans fat was a short communiqué recommending a voluntary approach of industry to reduce trans fat in the food supply ¹³.

The issue pertains to the high intake of unhealthy fats i.e. trans fat *and* saturated fat intake, and that despite reported trans fat levels dropping to below recommended levels, saturated fat intake has not changed and still exceeds recommended Government health authorities' levels.



2) Effective Interactions between Government and the Food Industry

○ **Open and effective dialogue with the Food industry.**

The Heart Foundation believes the Government could address more effectively the issue of unhealthy fat intakes by encouraging/facilitating food companies adopting the use of healthier oils thereby reducing saturated fat and trans fat in the food supply in manufacturing by:

- Working with the food industry to set targets for the food supply – from farm to fork – to increase the proportion of foods that are grown, formulated and reformulated, eliminate the use of industrially produced trans fats and reduce the use of both trans fat and saturated fat;
- Collaborating with industry in developing new opportunities for the production of canola and other oil seeds;
- Encouraging Australian research and development of new trans fat alternatives;
- Exploring the possibility of allowing trans fat nutrient content claims and health claims that are more appropriate for the food industry on food packaging.

3) Facilitate a Social marketing campaign on food labels

○ **Facilitate a consumer Social marketing campaign on food labels.**

The Heart Foundation believes the Government could facilitate a well-funded and evaluated social marketing campaign on how to read labels, especially Nutrition Information Panels (NIPs) and ingredient lists with a focus on fat types and serve sizes.

Specifically addressing:

- Reviewing nutrition messages in order to clearly communicate the detrimental effect of consuming trans fat but also other types of fats and to provide consumers with consistent accurate advice;
- Co-operating with organisations and groups that work closely with consumers, particularly low income consumers, to raise awareness of the health effect of different fats and to offer consistent practical guidance regarding the purchasing and dietary habits.

4) Labelling of foods eaten away from home - a new frontier

- **Food labelling of foods eaten away from home.**

This is an area of the food supply chain where there is an absence of Government policy and consequently it is not captured by the current food legislative body. The significance of this is great in terms of public health given that one third of the food dollar is spend on foods eaten outside the home.

Specific issues relating to foodservice items include but are not limited to

- lack of nutrition labelling;
- unknown but perceived be poor nutritional value; and
- disproportionate skew toward foods that is high in salt and unhealthy fats, and low in fibre, fruit, vegetable and wholegrain content.

5) Data and Monitoring

- **Data collection and monitoring of saturated and Trans fat intake.**

The Heart Foundation calls for the Government to commit to collecting Australian population dietary saturated fat **and** trans fat intake data through a thorough and regular national nutrition biomedical survey, and track dietary intake changes over time. Tracking this data would highlight any increases in the consumption of saturated fat and trans fats.

In addition, the Heart Foundation recommends implementing appropriate targeted regulatory and non-regulatory approaches that will result in reducing both saturated fat and trans fat, and increasing unsaturated fats, across the Australian food supply.

For example, a significant proportion of palm oil is used in producing foods from the foodservice sector but a food regulatory approach is currently limited due to the exemptions in the FSANZ Code of foods eaten away from home, and therefore these food items are not required to disclose NIPs and Ingredients lists.



In summary, the Heart Foundation offers some possible recommendations to Industry and Government to consider and adopt to address the unhealthy and disproportion intake of saturated fat in Australians' diets.

These include a range of strategies such as

- *Use of consumer messages beyond a food label (Industry and Govt)*
- *Facilitating a social marketing campaign on food labels (Govt)*
- *Developing a comprehensive, national, whole of government food policy (Govt)*
- *Effective interactions between Government and the food industry to facilitate the above strategies (Industry and Govt)*
- *Labelling of foods eaten away from home (Industry and Govt)*
- *Reformulating foods to reduce saturated and trans fats by replacing with cis-unsaturated fats (Industry)*
- *Using ingredients and products with negligible trans fats but not at the expense of significantly increasing saturated fats (Industry)*
- *Replacing partially hydrogenated or hydrogenated oils with oils high in cis-unsaturated fats (Industry)*



Issue 6. That manufacturers should be encouraged to use sustainable palm oil in their production process and can subsequently use the status of 'Certified Sustainable Palm Oil' as a business benefit.

Heart Foundation believes consumers may be confused between palm oil that is certified sustainable versus palm oil that is not, and that regardless of this status, palm oil is highly saturated, and its use in food production should be minimised and replaced with healthier fats and oils to improve the health of all Australians.

The Heart Foundation does not have expertise in this area but agrees in principle with sustainable agricultural practices, and therefore supports the Roundtable for Sustainable Palm Oil (RSPO) in its efforts to achieve sustainable palm oil production.

However, the Heart Foundation wishes to raise the issue that consumers may be confused between palm oil that is certified sustainable versus palm oil that is not, and that regardless of this status, palm oil is highly saturated, and its use in food production should be minimised and replaced with healthier fats and oils to improve the health of all Australians.

The Heart Foundation believes that the food industry i.e. manufacturers, retailers and foodservice outlets be encouraged to use healthier fat alternatives to palm oil. It has produced a 3-Step Guide to help the foodservice industry reduce the level of saturated and trans fat in food prepared and served to Australians. This document briefly outlines why these fats should be removed from food, where they are found in menu items, and the simple steps that can be taken to reduce them. The 3-Step Guide will be updated regularly to include new products as they become available. A copy of the guide is attached for reference. It is also available to download at http://www.heartfoundation.org.au/Professional_Information/Tick/3-Step_Guide.htm

Conclusion

- The Heart Foundation overall believes that the Bill is important as it helps to highlight the problem with fats and oil sources in our food supply which are high in saturated fat.
- This Bill would be a first step to helping the community understand which foods contain palm oil but that it would be important that further community education is undertaken to ensure that people understand the other high saturated fat sources (e.g. tallow, coconut oil, etc). The Heart Foundation would be very keen to see a comprehensive approach including nutrition and labelling education strategies taken across the whole food supply chain.
- While the Heart Foundation acknowledges the environmental issues in the media around palm oil production, being a leading health organisation means our focus is on the detrimental health aspects of palm oil, whether palm oil is derived from a sustainable source or not, it will still contain more than 50% saturated fat which is unacceptably high.
- The Heart Foundation advocates for the food industry (food retailers, food manufacturers, food ingredient suppliers) to source alternative fats and oils with healthier fat profiles i.e. higher unsaturated fat content to replace palm oil. Please see the 3 Step Guide, attached.
- The Heart Foundation recommends that Governments use consumer messages beyond a food label; facilitate social marketing campaign(s) on food labels; develop a comprehensive, national, whole of government food policy; have effective interactions between Government and the food industry to assist the above, and to require labelling of foods eaten away from home.
- The Heart Foundation agrees in principle with sustainable agricultural practices, and therefore supports the Roundtable for Sustainable Palm Oil (RSPO) in its efforts to achieve sustainable palm oil production. However, the Heart Foundation wishes to raise the issue that without additional education and information, consumers may be confused between palm oil that is certified sustainable versus palm oil that is not, and that regardless of this status, palm oil is highly saturated, and its use in food production (in foodservice and retail) should be minimised and replaced with healthier unsaturated fats and oils to improve the health of all Australians.



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