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# **NIP review preliminary position response**

30 November 2025



AUSTRALIAN  
**FOOD &  
GROCERY**  
COUNCIL

CELEBRATING  
**30** YEARS  
1995-2025

## PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, beverage and grocery manufacturing sector.

With an annual turnover in the 2023-24 financial year of \$172 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide \$4.8 billion capital investment in 2023-24.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 32% of total manufacturing turnover in Australia. The industry makes a large contribution to rural and regional Australia economies, with almost 36 per cent of its 294,000 employees being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

The industry has a clear view, outlined in *Sustaining Australia: Food and Grocery Manufacturing 2030*, of its role in the expansion of domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

*This submission has been prepared by the AFGC and reflects the collective views of the membership.*

## GENERAL COMMENTS

The AFGC welcomes the opportunity to contribute to the Food Standards Australia New Zealand (FSANZ) *Preliminary position paper - Nutrition information panel review*.

The AFGC and its members strongly support FSANZ's position that no regulatory change to the Nutrition Information Panel (NIP) is required at this time.

The AFGC acknowledges the work FSANZ has undertaken in this preparatory paper, including the technical assessments. These assessments drew on previous nutrition labelling work, relevant ministerial policy guidelines, the Australian and New Zealand dietary guidelines, dietary consumption surveys, international and overseas regulations, both new and existing consumer research, estimated costs of label changes, and stakeholder perspectives

The current NIP framework provides consistent, evidence-based, and consumer-relevant nutrition information, enabling Australians and New Zealanders to make informed dietary choices. It continues to perform its primary role effectively, presenting clear and comparable data across product categories.

The AFGC supports the following FSANZ findings and conclusions in the position paper (page 20):

- The NIP format has worked well for over two decades, helping consumers easily find and compare nutrition information.
- Keeping a consistent format supports informed food choices and aligns with ministerial policy guidance
- While too much extra information can confuse some consumers, food companies should still be permitted to include voluntary details (such as % Daily Intake) when relevant and not misleading—especially where nutrition or health claims are made.
- There is no strong evidence that current nutrient sub-groupings (like “fat, total” and “saturated fat”) cause confusion. Consumers may not know every technical term but can still use the NIP to make healthier decisions.
- Limited understanding of some nutrients reflects general nutrition knowledge, not a flaw in the label design. The NIP alone cannot fix broader nutritional literacy issues.
- International nutrition panels differ across countries to reflect local diets and literacy levels. The current NIP format is familiar, evidence-based, and generally consistent with Codex guidance. Using overseas label formats could confuse consumers and weaken trust in Australian and New Zealand labelling standards.

The AFGC also supports FSANZ's evidence-based, consultative approach. The AFGC anticipates that this approach will also be applied to potential future changes to the NIP, such that they are underpinned by robust scientific data and consumer research. Industry values this measured approach, which balances regulatory oversight with practical feasibility.

Unnecessary or ineffective changes could impose significant operational and financial burdens to industry without measurable benefits for public health, while potentially creating confusion among consumers.

The AFGC notes that FSANZ has acknowledged in its position paper that the costs of label changes have been considered. Given the widespread adoption of the current format, modifying the NIP regulation at this time would impose significant burdens on manufacturers of all sizes.

The stability of the current NIP framework allows manufacturers to focus resources on initiatives that directly improve public health outcomes rather than on frequent regulatory adjustments. Regulatory consistency also enables industry to plan and implement nutrition-related innovation efficiently, while maintaining compliance and minimising costs associated with redesigning labels or modifying manufacturing systems.

## CONCLUSION

The AFGC and its members fully endorse FSANZ's position that the NIP should remain unchanged.

Retaining the current structure ensures continuity, transparency, and clarity for consumers, supports effective compliance by industry, and allows resources to be focused on initiatives that deliver measurable health outcomes. Mandating change now risks diverting resources and creating cost burdens without clear consumer benefit justification.

The industry looks forward to working constructively with FSANZ to monitor emerging evidence, support consumer education, and contribute to regulatory reviews when warranted.

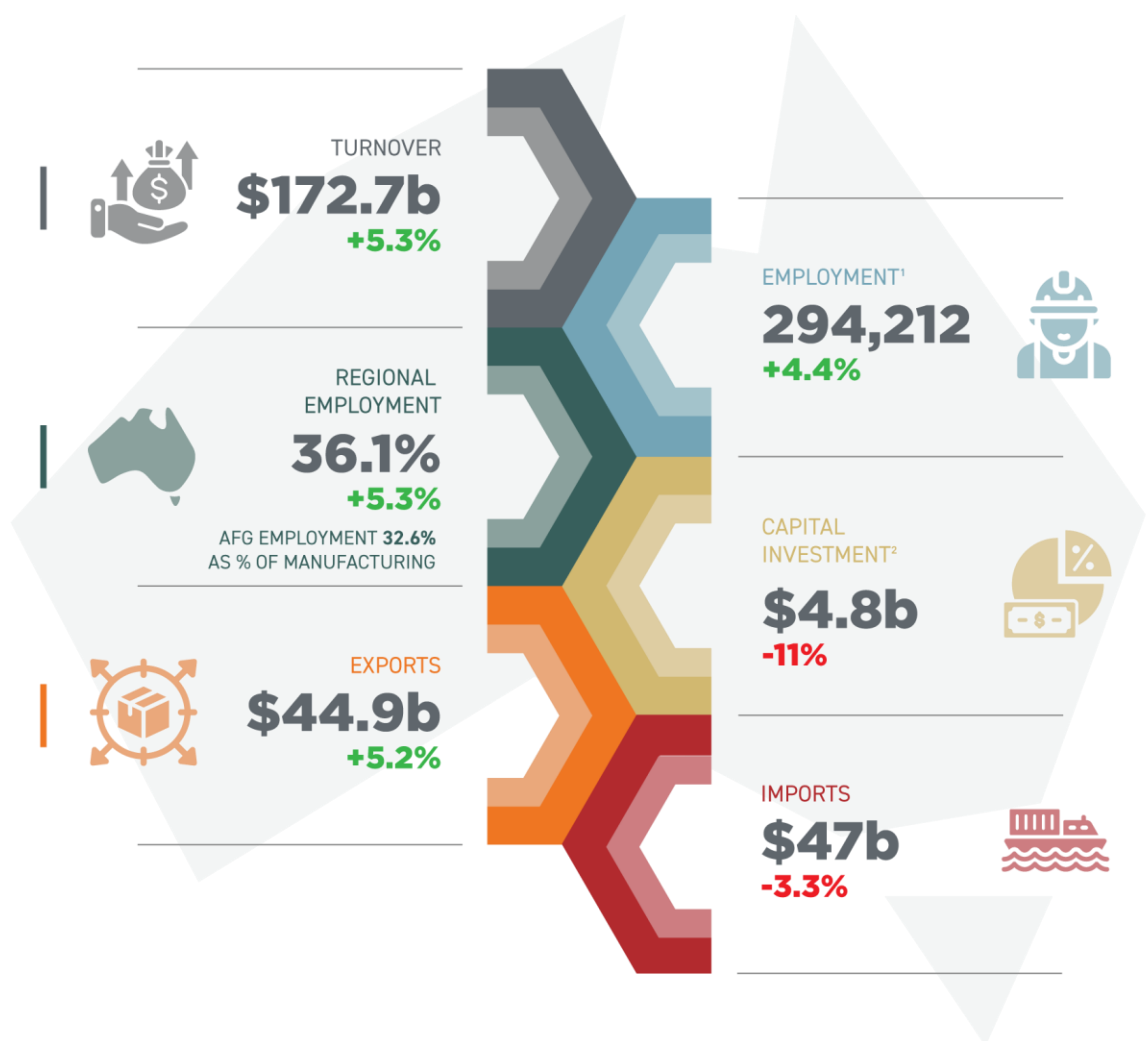


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# STATE OF THE INDUSTRY

## 2023-24



The figures on this page exclude the fresh food sector and are based on 2023-24 ABS data.

1: This is total number of employees, head count basis and does not include seasonal employees.

2: Gross fixed capital formation for food, beverage and tobacco manufacturing subsector is taken as indicator of capital investment.