

30 September 2026

Project Manager
National Health and Medical Research Council
GPO Box 1421
Canberra ACT 2601
Email: nrv@nhmrc.gov.au

Dear NHMRC

Attached are the comments that the Australian Food and Grocery Council wishes to submit on the *Nutrient Reference Values - Public Consultation on Draft Recommendations for Sodium*

If you have any queries, please contact Anne-Marie Mackintosh anne-marie.mackintosh@afgc.org.au

Yours faithfully



Dr Duncan Craig
Director - Health, Trade and Regulatory Affairs
Australian Food and Grocery Council

**NHMRC Nutrient Reference Values - Public
Consultation on Draft Recommendations for
Sodium
30 SEPTEMBER 2026**



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation bringing Australia's fast-moving consumer goods (FMCG) sector together to champion growth.

With an annual turnover in the 2024-25 financial year of \$182.6 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 \$4.5 billion capital investment in 2024-25, underpinning the sector's continued growth.

Food and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 33 per cent of the total national manufacturing workforce. The industry makes a large contribution to Australia's rural and regional economies, with over 30 per cent of its 301,000 employees based outside metropolitan areas.

It is essential to the economic and social development of 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's growth ambition to 2030 is set out in *Sustaining Australia: Food and Grocery Manufacturing 2030*, which outlines a path to expand domestic manufacturing, create jobs, increase exports and strengthen 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 Australian Food and Grocery Council (AFGC) and its members appreciate the opportunity to respond to the NHMRC [Nutrient Reference Values - Public Consultation on Draft Recommendations for Sodium](#).

AFGC supports transparent consideration of the evidence base for reviewing sodium nutrient reference values (NRVs), including relevant context about population-level sodium reduction.

However, AFGC notes that the draft [Evidence Summary Report](#) appears to deviate from other NRV reviews, with greater attention to potential population-level interventions and the policy context in which sodium recommendations may be used.

SPECIFIC COMMENTS

The draft Evidence Summary Report includes a section on ‘interventions to reduce population sodium intakes’, including those related to the food supply and discretionary salt use. However, it is unclear how this intervention evidence has been considered and how it relates to the scientific basis for the proposed sodium NRVs (the primary scope and purpose for the review).

AFGC understands that the intervention discussion does not impose any obligations or commitments, which is a decision purely for policy makers. The key issue for AFGC is not whether sodium reduction is an important public health objective, but whether the intervention evidence is clearly distinguished from the scientific evidence used to derive the sodium NRVs. Without this distinction, readers may incorrectly interpret the evidence summary as endorsing particular implementation measures, rather than as providing context for understanding sodium intake and population health.

This is exacerbated by the following statement in the [draft sodium recommendations document](#) that could be misinterpreted as a recommendation from the NHMRC (which is outside the remit of the review):

“These findings indicate that further interventions may be required to support the population to achieve intakes aligned with sodium recommendations for the reduction of chronic disease risk”.

Recommendation: the AFGC recommends that where contextual or intervention material is included, the evidence summary should clearly explain how that material has been weighed and if/how it relates to the derivation of the NRVs themselves. This is required so that users of the review understand the distinction between scientific advice, implementation context and policy options.

CONCLUSION

AFGC supports transparent consideration of the evidence relating to sodium intake and population health, including relevant implementation context. However, the final evidence summary should clearly distinguish between evidence used to derive sodium NRVs and broader material relating to interventions to reduce population sodium intakes. This distinction is important to ensure the sodium NRV review remains scientifically focused and is not interpreted as creating, endorsing or pre-empting specific implementation measures which is a decision for policy makers.



State of the Industry

2024-25



The figures on this page exclude the fresh food sector and are based on 2024-25 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.