



strokefoundation

GPO Box 111  
Brisbane  
QLD 4001 Australia

T +61 7 3084 6384  
F +61 7 3102 9212

Call StrokeLine  
1800 STROKE (1800 787 653)

E [admin@strokefoundation.com.au](mailto:admin@strokefoundation.com.au)  
[www.strokefoundation.com.au](http://www.strokefoundation.com.au)

ABN  
42 006 173 379

13<sup>th</sup> October 2015

Food Safety Queensland

By email: [foodsafety@health.qld.gov.au](mailto:foodsafety@health.qld.gov.au)

To whom it may concern,

**Re: Fast Choices Kilojoule Labelling Consultation Discussion Paper**

Thank you for the opportunity to make a submission in response to the Fast Choices Kilojoule Labelling Consultation Discussion Paper.

The National Stroke Foundation (NSF) strongly supports and endorses any measures that will reduce the prevalence of obesity in the community. Obesity is a preventable risk factor that later can lead to the onset of chronic disease.

According to the Australian Institute of Health and Welfare, the leading risk factors for Australasia (Australia and New Zealand) in 2014 were:

1. dietary risks (accounting for 11% of the total burden)
2. high body mass index (related to overweight and obesity) (9%)
3. smoking (8%).<sup>i</sup>

While these risk factors are associated with many diseases, the main conditions affected were cancer, cardiovascular diseases, and diabetes, urogenital, blood and endocrine diseases combined.<sup>ii</sup>

The proportion of overweight or obese adults in the population has increased at an alarming rate in recent decades from 57% in 1995 to 63% in 2011–12. What is most alarming is that this is largely driven by an increase in the level of obesity from 19% to 27% over the period, with the proportion of overweight but not obese adults remaining similar (36% to 38%).<sup>iii</sup>

Obesity is associated with an unhealthy lifestyle, in particular an unhealthy diet. Fast food products are major contributors to unhealthy diets in Australia, with almost 17,000 Australian fast food outlets serving approximately 1.64 billion fast food or take away meals in 2007.<sup>iv</sup> In its review of fast food labelling, the New South Wales Government found that 15% of money spent on food was spent on fast food.<sup>v</sup>

People are increasingly eating out of the home, and a large proportion (44%) of meals served out of the home are fast food.<sup>vi</sup>

Following the encouraging results from mandatory kilojoule menu labelling for fast food chains, the NSF would encourage the Queensland Government to give full consideration to reviews from states such as NSW and use past experience to guide their move into menu labelling.

The NSF fully endorses and supports the use of the health star rating system with specific nutrient content to provide consumers with a clear and consistent understanding of risk nutrients such as saturated fat, sodium and sugars across food products in the market place. These measures should be supported with appropriate public education campaigns to increase the community's understanding of both the labelling system and the impact of poor dietary choices.

The NSF would add the following response to the questions asked in the consultation discussion paper.

**Response to Q1. It is proposed to introduce a menu labelling scheme in Queensland. What are the issues that you may consider could be envisaged with respect to the implementation?**

One issue is the legibility of the energy labelling. The National Stroke Foundation (NSF) supports the view that all labels should be the same font (ie. the same colour, text size and style) as that of the menu item's price or item description – whichever is larger. The energy label should reflect the kilojoule amount for the entire menu item.

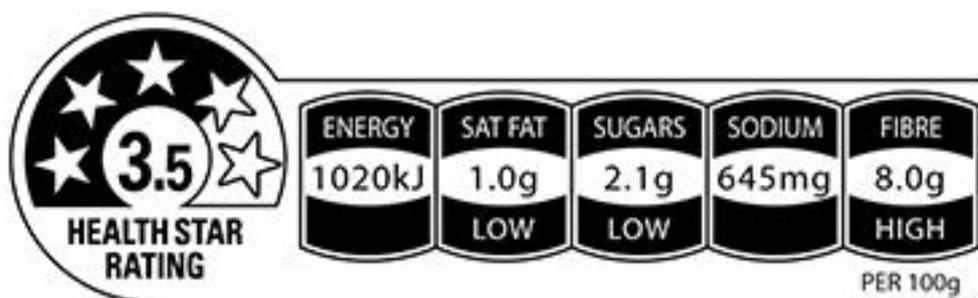
**Response to Q2. The proposed scope of outlets to be captured is aligned with other jurisdictions that have introduced such a scheme (20 outlets in Queensland or 50 nationally). What are the challenges and opportunities of this proposed capture?**

This measure mirrors the NSW scheme and has proven to be an effective definition for capturing major fast food outlets.

**Response to Q4. What nutrition information should be displayed at the point of sale?**

The NSF supports mandatory kilojoule labelling and also recommends the use of the health star rating system which is gaining consumer support through its use on processed food products. This would help facilitate greater consistency in labelling across the market. It is recommended that consideration be given to the health star rating system format which provides specific nutrient information particularly on risk

nutrients such as saturated fats, sugars and sodium and any positive nutrients as illustrated below:



**Response to Q5. How should interpretive information such as colour-coding, star ratings, walking index, be provided to help consumers understand kilojoules and the impact on overall health?**

The NSF recommends the use of a ratings system that alerts consumers to products high in salt, fats and sugars. Conversely, the NSF would also encourage the promotion of healthy products with a star rating that is easily identifiable. As mentioned in Q4, the NSF strongly advocates for consistency across the food market and therefore encourages consideration of incorporation of the health star rating system in menu labelling as which consumers are becoming increasingly familiar with.

**Response to Q6. What information and communication methods would help the public to understand this initiative? Consider what different approaches may be required for various population groups.**

The NSF supports the use of a public education campaign that educates people about the new labelling laws and informs them of what to look for at fast food outlets. The Queensland Government should leverage off the success of other state governments, such as NSW, to raise community awareness about dietary energy requirements to ensure the provision of kilojoule information is understood. The NSW Government has also developed its [www.8700.com.au](http://www.8700.com.au) website, which informs consumers about their daily kilojoule requirements, the kilojoule content of a range of foods (including fast food) and its legislation on food labelling. The NSF supports such public education measures and recommends that they be utilised in Queensland.

**Response to Q7. How could the food industry be supported to implement the menu labelling requirements and introduce healthier choices?**

The National Review of Food Labelling Law and Policy (2011) provided recommendations regarding the introduction of national mandatory requirements for

declaration of the kilojoule content of standard products on food chain menus and menu boards.<sup>vii</sup> The Food Regulation Standing Committee subsequently developed guidelines to assist jurisdictions to develop nationally consistent kilojoule labelling on menus.<sup>viii</sup> The NSF would suggest that these be used by the Queensland Government as a useful starting point for food labelling.

The NSF would also suggest that the Queensland Government look at developing a system, incorporating the health star rating system that recognises and promotes healthy options at fast food outlets with prominent labelling.

**Response to Q8. What are the broader impacts of this initiative on the food industry and the public and how could uptake of the initiative be encouraged?**

Experience in the United States has also found that the introduction of energy labelling has increased the sale of items with lower energy values.<sup>ix</sup>

The NSW fast food labelling review also found similar responses after implementing its fast food labelling program. Consumers that were surveyed said they anticipated that the menu labelling changes would increase the likelihood of consumers making different fast food orders. There was also some evidence that consumers intercepted at outlets were purchasing foods with fewer kilojoules. In total, average kilojoules purchased reduced from 3670kJ to 3241 kJ.<sup>x</sup>

**Response to Q9. What measures should be included in the evaluation?**

The NSF would suggest a similar approach taken by the NSW Food Authority's review (Review of Fast-food Labelling Requirements). In this review, the Food Authority looked at whether the policy objectives of the Fast Choices legislation remained valid after the introduction of fast food labelling requirements and whether the legislation in its current form remained appropriate for achieving those objectives.

The policy objectives were to:

1. create a standardised nutrition information system for food sold at standard food outlets in NSW to prevent confusion and promote consistency across fast food chains in NSW;
2. provide consumers in NSW with clear and consistent nutrition (energy) labelling information of food sold at fast food outlets so that consumers are better informed to make healthy food choices and are more confident in the choices that are they making;
3. contribute to NSW 2014 objectives in reducing adverse health outcomes relating to the over consumption of fast foods by providing consumers in

- NSW with energy labelling information so that consumers are encouraged to make healthier food choices over time;
4. support the establishment of health protection principles that work to help minimise and prevent overweight, obesity and chronic disease in NSW consumers by providing appropriate forms of consumer education in support of the fast food labelling initiative;
  5. implement fast food labelling requirements in NSW that address a perceived regulatory gap when compared to the labelling requirements of packaged food where energy content (and other nutrition information) must be displayed; and
  6. implement a standardised, information system in NSW' that is scalable to a nationally consistent approach (should this become desirable) which can be easily rolled out by national companies

The review found that the evidence suggested the legislation is working as intended and fast food outlets are demonstrating high levels of labelling compliance.

**Response to Q10. Do you have any further comments on the proposed scheme?**

The NSF welcomes this initiative by the Queensland Government and looks forward to seeing the positive impact it will have on people's fast food choices.

For further information please feel free to contact me on 3084 6384

Yours Sincerely



*Libby Dunstan*  
**Executive Officer – Queensland  
National Stroke Foundation**

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- <sup>i</sup> Australian Institute of Health and Welfare (AIHW) 2014. Australia's health 2014. Australia's health series no. 14. Cat. no. AUS 178. Canberra: AIHW.
- <sup>ii</sup> Australian Institute of Health and Welfare (AIHW) 2014. Australia's health 2014. Australia's health series no. 14. Cat. no. AUS 178. Canberra: AIHW.
- <sup>iii</sup> AIHW. Who is overweight? <http://www.aihw.gov.au/who-is-overweight/#adults>
- <sup>iv</sup> BIS Shrapnel. Proposal: Fast Food in Australia, 2009. BIS Shrapnel Pty Ltd.  
[http://www.bis.com.au/verve/resources/Fast\\_Food\\_in\\_Australia\\_09\\_Proposal.pdf](http://www.bis.com.au/verve/resources/Fast_Food_in_Australia_09_Proposal.pdf)
- <sup>v</sup> NSW Government, Food Authority. Review of Fast-food Labelling Requirements ("Fast Choices). 2012.  
[http://www.parliament.nsw.gov.au/prod/la/latabdoc.nsf/0/219ba29066e39928ca257ab6001b01b0/\\$FILE/Section%20106R%20Review%20of%20Food%20Act%202003.pdf](http://www.parliament.nsw.gov.au/prod/la/latabdoc.nsf/0/219ba29066e39928ca257ab6001b01b0/$FILE/Section%20106R%20Review%20of%20Food%20Act%202003.pdf)
- <sup>vi</sup> Fast food and vending machine nutrition information  
<http://www.opc.org.au/downloads/positionpapers/policy-brief-fast-food-vending-machine-nutrition-info.pdf>
- <sup>vii</sup> Review Panel. Labelling logic: review of food labelling law and policy. Canberra: Commonwealth of Australia. 2011.
- <sup>viii</sup> Department of Health and Ageing (2012). "Principles for Introducing Point-Of-Sale Nutrition Information at Standard Food Outlets".
- <sup>ix</sup> Bassett, M.T. et al. Purchasing behaviour and calorie information at fast-food chains in New York City. *Am J Pub Health* 2008, 98(8);
- <sup>x</sup> NSW Government, Food Authority. Review of Fast-food Labelling Requirements ("Fast Choices). 2012.  
[http://www.parliament.nsw.gov.au/prod/la/latabdoc.nsf/0/219ba29066e39928ca257ab6001b01b0/\\$FILE/Section%20106R%20Review%20of%20Food%20Act%202003.pdf](http://www.parliament.nsw.gov.au/prod/la/latabdoc.nsf/0/219ba29066e39928ca257ab6001b01b0/$FILE/Section%20106R%20Review%20of%20Food%20Act%202003.pdf)