



COORDINATED SAMPLING PROJECT 14 – IMPORTED FOODS II

Conducted August to October 2014 with Local Governments across Western Australia



December 2017

Local Health Authorities Analytical Committee

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Executive Summary

There is strong public support for the continued regulation of food labelling in Western Australia. In order to support the enforcement of the Food Standards Code, address public concern regarding imported products and inform public health initiatives in light of Australia's growing chronic disease prevalence, LHAAC implemented the Coordinated Sampling Project (CSP) 14 – Imported Foods II. This project aimed to assess the adherence to labelling requirements, and accuracy of nutritional information as outlined in the Food Standards Code. These results would then be compared to the previous CSP 7 – Imported Foods I. This was done with the collaboration of Local Government Agencies (LGAs) which collected samples of imported foods throughout Western Australia. These samples were then analysed by Agrifood or ChemCentre (appointed analysts to LHAAC) for their accuracy of nutritional information to within +/-20% of the stated amounts, and adherence to the labelling requirements outlined in the Food Standards Code.

This CSP found there to be a high degree of inconsistent samples in both nutrition information and labelling requirements. Of the 200 samples analysed for nutritional information 85.5% were found to provide inaccurate nutritional information for at least one nutrient, and of the 153 samples analysed for labelling requirements 95% were found to be inconsistent in at least one category. This is of concern for all West Australian citizens whom rely on nutritional information labels to inform purchasing decisions in support of personal and family health management. Some labelling requirements were adhered to rigorously, with less than 5% of samples failing to provide the name of the supplier or manufacturer and country of origin, or use the correct font for warning statements. Samples did not meet other labelling requirements to a satisfactory degree such as the declaration of allergen information, with 62% of samples inconsistent, and the inclusion of storage directions with 39% of samples inconsistent. The inclusion of allergen information is vital for any West Australian with allergies in order to make informed food choices and have clearly available the information to accommodate their allergy. The presence of storage directions is also of vital importance as correct storage of products minimizes the risk of illness from food borne pathogens.

The previous CSP found 51.5% of the 340 samples analysed to be inconsistent for either nutrient and/or labelling requirements. This CSP shows an increase in the prevalence of inconsistent labelling and nutrient information amongst West Australia's imported food products. This calls for appropriate follow up action by LGAs in order to reduce the inconsistencies found on imported foods.

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List of abbreviations

Coordinated Sampling Project (CSP)
Food Standards Australia and New Zealand (FSANZ)
Food Standards Code (FSC)
Local Government Authorities (LGA)
Local Health Authorities Analytical Committee (LHAAC)

Background

The public of Western Australia has shown strong support for the continued upkeep of food control policies to improve diet and reduce obesity amongst other chronic diseases. In particular, Pollard, Daly, Moore and Binns (2013) found that 97% of the adult West Australian population supports the continued regulation of food labelling. In the decade leading up to 2013 imports rose by an average of 4 percent each year. Monitoring and assessment of these imported foods as well as all foods is of high priority to the public (Department of Agriculture, 2014).

Currently the Department of Agriculture and Water Resources operates the Imported Food Inspection Scheme (IFIS). FSANZ advises the Department of Agriculture and Water Resources on imported food's risk categorisation. Risk foods are routinely inspected and tested for compliance with the FSC Chapters 1 and 2 and against a list of potential hazards, including micro-organisms and contaminants. All other foods are considered surveillance foods and have a 5% chance to be tested against Australian food standards (Imported Food Inspection Scheme, 2017). The latest report on the Imported Foods Inspection Scheme found 98.9% of samples were compliant however of the non-compliant samples incorrect labelling accounted for the majority of the non-compliance (Department of Agriculture and Water Resources, 2016).

Food provides an important link between the many facets of the Environmental Health Officer's role. Friel (2010), establishes a link between food availability and quality, and the risk of chronic disease. Friel (2010), further argues that a food system focused upon the nutritional quality of food over other aspects may assist in overcoming climate change as well as food security, nutritional security and food sustainability. Also of note is the increased reliance of indigenous populations on imported foods that are high in energy but low in nutrient content, contributing to their increased prevalence of chronic disease compared to non-indigenous Australians (Friel, 2010).

Also of importance is the continued epidemic of obesity in Australia, with the National Preventative Health Strategy listing obesity as one of the top three preventable health challenges that faces the nation (National Preventative Health Taskforce, 2009). Ridders, Lawrence, Hafekost, Mitrou and Zubrick (2013), suggests that this rise in obesity has been paralleled by a rise in the sugar content of imported foods as well as the volume of imported foods consumed throughout Australia. Ridders, Lawrence, Hafekost, Mitrou and Zubrick (2013), further call for more in depth data to investigate this possibility further.

More in depth research and analysis is needed in order to understand the factors influencing the health of West Australians and the impact imported foods may play. The greater the knowledge gained in this area the more informed decision-making can take place by policy makers, and by the public when making purchasing decisions.

Introduction

This report aims to present and discuss the findings from the LHAAC CSP No. 14 - Imported Foods II. This project aimed to assess the labelling and nutritional information on foods that are imported, from a range of outlets across a number of LGA's and whether or not they comply with the current FSC. These results were then compared and discussed against CSP 7 - Imported Foods.

The samples collected in this project were analysed for nutritional content per 100g and assessed against elements from the Food Standards Code Part 1.2 as outlined below (FSANZ, 2016):

- | | | |
|-----------------|--|--|
| Standard 1.2.2 | Food Identification Requirements | <ul style="list-style-type: none"> • Name of Food clearly stated • Lot identification • Name and address of supplier/manufacturer |
| Standard 1.2.3 | Mandatory Warning & Advisory Statements & Declarations | <ul style="list-style-type: none"> • Allergens Declared |
| Standard 1.2.4 | Labelling of Ingredients | <ul style="list-style-type: none"> • Nutrients listed on label in correct order |
| Standard 1.2.5 | Date Marking of Packaged Food | <ul style="list-style-type: none"> • Label has best before/ use by date |
| Standard 1.2.6 | Directions for Use and Storage | <ul style="list-style-type: none"> • Storage directions on label |
| Standard 1.2.7 | Nutrition, Health & Related Claims | <ul style="list-style-type: none"> • Health Claims if any and where analysed |
| Standard 1.2.8 | Nutrition Information Requirements | <ul style="list-style-type: none"> • NIP laid out as prescribed by standard • Expressions of quantities in correct format |
| Standard 1.2.9 | Legibility Requirements | <ul style="list-style-type: none"> • Correct use of font size for warning statements • Label are in English or have an English Translation |
| Standard 1.2.11 | Country of Origin Labelling | <ul style="list-style-type: none"> • Label has country of origin on it |

This report is intended for use by LGAs throughout Western Australia to help ensure compliance with the Food Standards Code and to inform policy decision making.

Sampling and Analysis Methodology

From August through October of 2014, samples were collected from LGA's across WA. Samples were collected based upon the population of the LGA (see Table 1), the number of food outlets within each locality and the product type assigned to each LGA (see Appendix A). A minimum sample size of 200g/mL was suggested per sample collected.

Population of LGA	# of samples
<2000	1
2001 - 5000	2
5001 - 10 000	3
10 001 - 50 000	5
50 001 - 100 000	7
>100 000	10

Some LGA's located in rural or remote locations may not have outlets selling imported goods, and were therefore unable to participate. In some localities it was suggested to LGAs that supermarket stores may have an imported foods section and if this is the case participation was encouraged. In cases where large importers were located in the LGA, it was recommended to select samples that were specific to the area rather than goods that will be transported to a separate municipality in an effort to sample the largest range of products possible and avoid duplication. Specialist stores that focus on Asian, British, Italian or South African foods were also acceptable choices for product sampling options. Final premises and products chosen are at the discretion of each LGA.

LGAs were instructed as follows:

- Collect the indicated number of samples from food outlets in your locality and designated product group with a minimum sample size of 200g for food products and 200mL for beverage products.
- Submit the samples to Agrifood or ChemCentre.
- Review the results once received from Agrifood and ChemCentre as provided in this report.
- Participate in follow-up actions for non-complying products.

Product groups included were jams and fruits, dried products, cereal produce (including noodles rice and pasta), meat and seafood (canned and fresh), dairy/cheese, sauces/marinades, confectionary and miscellaneous/general foods (e.g. oils, cocoa powder, soups, nuts) (see Appendix A, Table 8). These categories were further simplified in the analysis of these samples (see Table 2).

Samples with nutritional information analysed, and found to be +/-20% of the nutrition information stated on the nutrition information panel (NIP) were considered inconsistent. Samples found to contain any labelling discrepancy as per the Food Standards Code were also considered inconsistent.

Results

Two hundred and ten samples were collected by October 10th of 2014 and were distributed as shown in Table 2 below.

Product Type	# of samples
Biscuits, Bread and Cakes	32
Cheese and Dairy	18
Meat and Fish	29
Fruit and Vegetables	18
Jams and Spreads	29
Noodles and Rice	25
Sauces	28
Seafood	9
Other	22

As shown above there was an uneven distribution of samples per category, however this sample can be considered strong due to its considerable size and the wide distribution of locations throughout Western Australia from which these products were sampled. Furthermore, the variety of assorted products sampled can also be considered a strength as this will better represent the variety of foods available to West Australian citizens.

Of these 210 samples analysed, ten were excluded based on the lack of a NIP and/or label for comparison with the analysed results. The total percentage of samples that contained any discrepancy between the provided NIP information and the nutritional analysis of the product completed by Agrifood or ChemCentre was 85.5%.

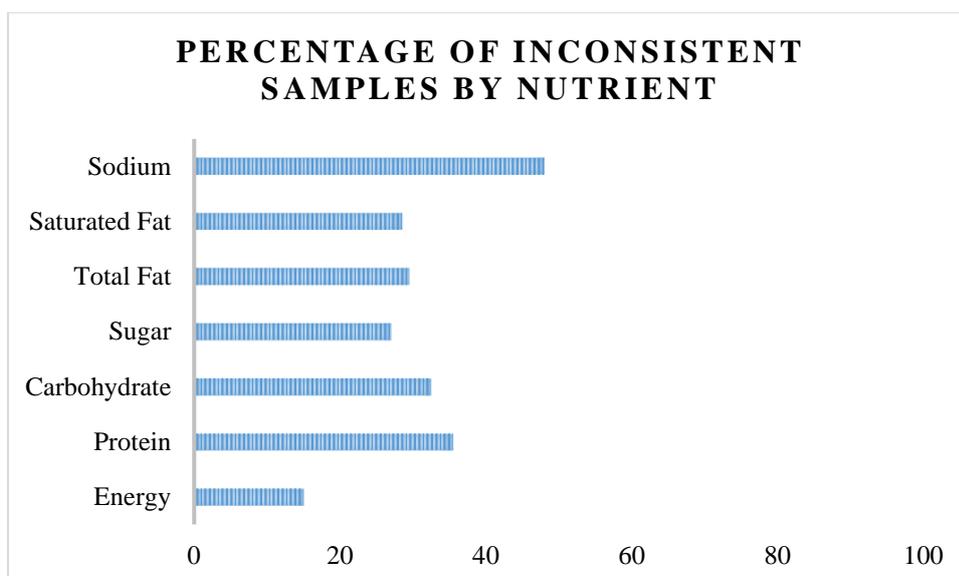


Figure 1: Percentage of samples found to be inconsistent per nutrient

The above Figure 1 demonstrates each nutrient categories percentage of inconsistencies. The most notable of which is sodium with an average across all product types of 48% of the 200 analysed samples containing inconsistencies greater than the threshold of $\pm 20\%$.

Each product category was found to contain a very high proportion of inconsistent samples with Biscuits/ Breads/ Cakes and Meat/ Fish having 97% inconsistent samples and Jams/ Spreads the lowest with 62% of samples being inconsistent. All product categories percentage inconsistencies are outlined below in Figure 2.

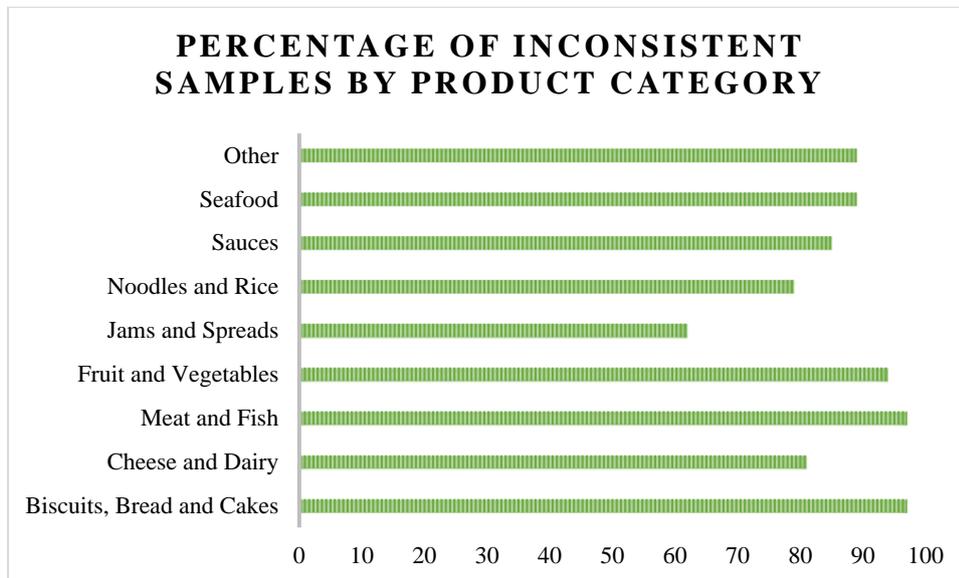


Figure 2: Percentage of samples found to have inconsistent NIP's per product type

Only 153 samples of the 210 samples collected were analysed for conformance with the Food Standards Code labelling items. The total number of inconsistent labels was found to be 95%. These labelling inconsistencies may include any that fall under the Food Standards Code Part 1.2. For a complete list of labelling requirements that were analysed, see Figure 3. Table 3 below displays the proportion of inconsistent samples to the total sample size for each product category.

Product	Percentage inconsistent
Biscuits, Bread and Cakes	96
Cheese and Dairy	100
Meat and Fish	81
Fruit and Vegetables	100
Jams and Spreads	100
Noodles and Rice	100
Sauces	100
Seafood	100
Other	78

As shown in the above table, all product categories contained a majority of products which did not conform to the Food Standards Code about correct labelling of their products. This sample was then stratified for inconsistencies per labelling item assessed as shown below in Figure 3.

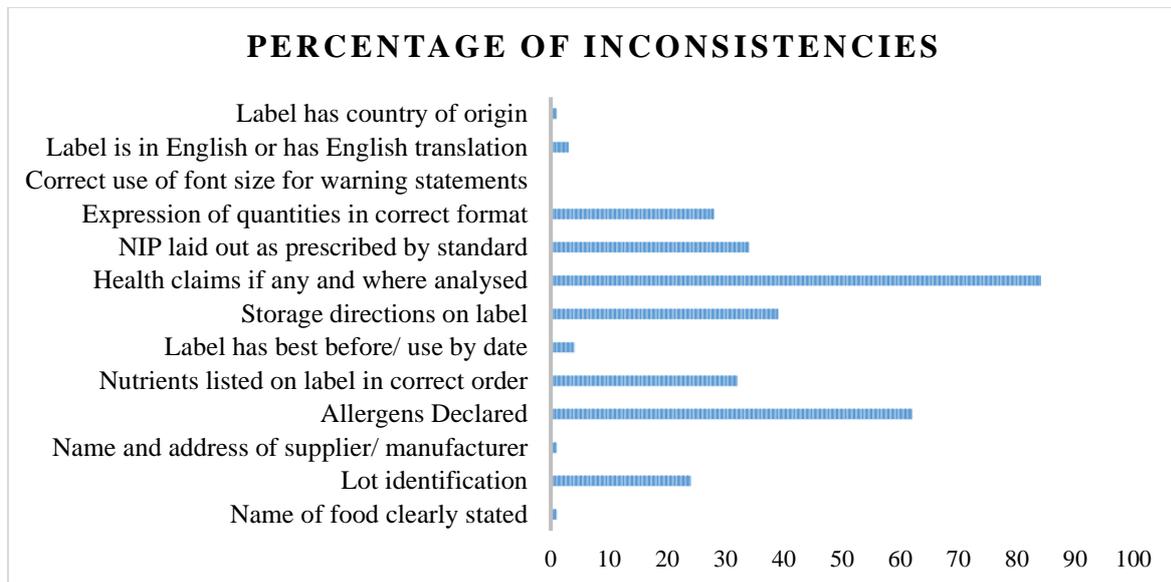


Figure 3: Percentage of inconsistencies per labelling item assessed

The declaration of allergens and the analysis of health claims were found to be highly inconsistent, with 62 and 84 percent found to infringe on the Food Standards Code respectively. The labelling items most conformed to were the correct use of font size for warning statements, as well as labelling the country of origin, name of food and the name or address of the supplier or manufacturer, all with less than 1% inconsistent.

Discussion

This CSP found there to be a concerning number of inconsistent samples of imported foods in Western Australia. The nature of discrepancies identified was that 85.5% of NIP's when tested were not within $\pm 20\%$ of what was stated, and that 95% of samples did not meet the labelling requirements set out by the Food Standards Code. Figure 2 and Table 5 demonstrate that this high level of inconsistencies is near uniform across all product types. This is of concern for any West Australians who rely on this information to inform their purchasing decisions or in the management of food related medical conditions.

It has been reported by Mhurchu and Gorton (2007), that the NIP is most often utilized by consumers for family members or themselves in relation to weight management goals or those who have specific dietary requirements. It is of vital importance that this information is as accurate as possible when it is perused by consumers before purchase. The NIP was also found to be used upon purchasing a new food or in comparing a potential new product to a regular purchase with a focus on familiar terms such as sugar, fat and cholesterol levels as other nutrients were not as well understood (Mhurchu & Gorton, 2007).

Allergens

The most concerning data from this CSP within the assessment of food labels was the 62% of inconsistent samples that had failed to provide information regarding the absence, presence or identification of any allergens present (see Figure 3). As 17% of Australians over the age of 2 are reported as having a food intolerance or allergy, and 7% report avoiding particular foods for cultural, religious or ethical reasons (Australian Bureau of Statistics, 2015), these findings directly impact a large portion of the population.

Storage Directions

Following this was the failure of 39% of products to provide storage directions on their products (see Figure 3). This is again of vital importance to consumers as knowledge of correct storage procedures and shelf lives for different foods may prevent the growth of harmful pathogens and decrease the incidence of food borne related illnesses (Fischer et al., 2007).

Labelling

There are also a number of positive findings from this CSP. As shown in Figure 3 a number of labelling requirements were rigorously adhered to with less than 5% inconsistencies concerning the name of the food, the name of the supplier or manufacturer and country of origin. The inclusion of English translations wherever necessary and correct use of font for warning statements was also very consistent. In these areas imported foods adhered to a high degree of accuracy to the Food Standards Code.

Comparison to CSP 7

The previous CSP on imported foods (April 2012) also analysed samples for consistency with labelling requirements as outlined by the Food Standards Code and accuracy of nutrient values on the NIP's. For example CSP 7 found that 51.5% of the 340 samples submitted were inconsistent for either food labelling requirements or inconsistent results from nutrient analysis in comparison to the values stated on the products NIP's, or inconsistent for both of these assessments one or multiple times (Local Health Authorities Analytical Committee, 2012). In comparison to the current CSP this represents an increase in the prevalence of inconsistent results both for food labelling requirements and for accuracy of nutrient data supplied on NIP's. This result emphasises the need for action by Environmental Health Officers in ensuring the future compliance of imported foods to the Food Standards Code labelling requirements and in providing accurate nutrient information on NIP's.

Strengths and Limitations

There were a number of limitations to this project. Firstly, there is a paucity of literature regarding foods imported into Western Australia which hindered comparing results and establishing confidence in any phenomena. A larger and more evenly distributed sample would have increased the reliability of results, including a greater degree of randomization in the selection of manufactures, vendors and goods selected. Increased differentiation between different product categories may also have enhanced the quality of results in identifying if any product categories were more likely to be inconsistent. Furthermore, the data received for analysis by LHAAC was incomplete and indicated some variations may have occurred in how each individual sample may have been analysed. Comparisons with the previous CSP on Imported Foods was also hindered by the differences in methodology as there were differing categories used by each CSP as well as varying sampling locations and data analysis. The strengths of this project are the breadth of its sample in terms of both product categories and locations that were sampled as well as the depth of analysis in covering all nutrients commonly found on NIP's as well as assessing the products ability to comply with the labelling requirements of the Food Standard Code.

Conclusion

- This CSP has found that there remains a high degree of inconsistencies amongst our imported food products in Western Australia in excess of the previous CSP Imported Foods I.
- For nutrient analysis there was found to be a high degree of inconsistencies across all nutrients with sodium being the highest by a significant margin. This is of concern to any West Australian resident relying on the nutrient information to inform their dietary choices.
- The variety of labelling discrepancies was also significant with absent allergen information being critical for West Australian citizens or guardians seeking to make informed food choices.

This report is intended to update LGA's and the public on the work LHAAC is undertaking in concert with LGAs to ensure the continued quality and safety of West Australian foods. The relevant LGAs were informed of inconsistent samples and appropriate action taken to ensure the future compliance of imported food products in WA to the Food Standards Code. Future Co-ordinated Sampling Projects should focus on further discerning the quality of imported foods to WA incorporating improved sampling and data analysis measures in order to ensure the continued food safety and quality of foods imported into WA.

Suggested action on non-complying products

To help to ensure consistent follow-up action on non-complying products the following actions were recommended:

1. Inform the retail outlet in writing that the relevant product does not comply with the Code.
2. When the manufacturer is based in WA, write to the manufacturer and the Local Government Authority in which the manufacturer is located.
3. In situations where the product is not manufactured in WA, the details of the non-compliance should be sent to the Department of Health who will pass the information to the correct enforcement agency in the State or Territory in which the manufacturer is located under the Home Jurisdiction Rule. A copy of the sample submission sheet and the results of analysis should be submitted to the Department of Health Food Unit with a description and details of the non-compliance.
4. Enforcement action can be initiated by a Local Government if the agency is not satisfied with the actions taken by the retailer and/or manufacturer for a product that does not comply with the Code. Where only the retail outlet is within the local government's area, this enforcement action can only be taken for sale of product that does not comply with the Code.

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Appendix A

Sampling Instruction Tables

Table 7 <i>Number of samples collected by each Local Government Agency</i>			
LGA	Number of Samples	LGA	Number of Samples
Albany	4	Irwin	2
Augusta/Margaret River	3	Joondalup	12
Bayswater	7	Kalamunda	5
Belmont	5	Karratha	5
Broome	3	Kwinana	6
Bunbury	5	Mandurah	7
Busselton	4	Manjimup	3
Canning	10	Melville	10
Claremont	3	Murray	4
Cockburn	11	Nannup	1
Cottesloe	3	Northam	3
Dandaragan	2	Northampton	2
Dardanup	2	Peppermint Grove	1
Denmark	3	Perth	5
Derby/West Kimberley	2	Rockingham	8
Donnybrook Balingup	2	South Perth	4
East Fremantle	3	Stirling	10
East Pilbara	5	Swan	10
Fremantle	5	Victoria Park	12
Greater Geraldton	5	Vincent	6
		Wanneroo	7
TOTAL			210

Table 8

Product groups assigned to each Local Government Agency

Product Group to Test	Lead LGA	Other LGAs
Jams and Fruits	City of Canning	Bassendean, Bayswater, Belmont, Beverley, Boddington, Boyup Brook, Bridgetown-Greenbushes, Brookton, Broome, Broomehill-Tambellup, Bruce Rock, Bunbury, Chittering, Claremont, Collie, Coolgardie, Coorow, Corrigin, Cottesloe
Dried Products	City of Stirling	Dalwallinu, Dandaragan, Dardanup, Denmark, Derby-West Kimberley, Donnybrook-Balingup, Dowerin, Dumbleyung, Dundas, East Fremantle, East Pilbara, Esperance, Exmouth, Fremantle, Gingin, Gnowangerup, Goomalling
Cereal Produce (incl. noodles, rice, pasta)	City of Joondalup	Albany, Armadale, Ashburton, Augusta-Margaret River, Irwin, Jerramungup, Kalamunda, Kalgoorlie-Boulder, Katanning, Kellerberrin, Kent, Kojonup, Kondinin, Koorda, Kulin, Kwinana, Lake Grace, Laverton, Leonora,
Meat and Seafood (Canned and Fresh)	City of Melville	Busselton, Cambridge, Capel, Carnamah, Carnarvon, Greater Geraldton, Karratha, Mundaring, Murchison, Murray, Nannup, Narembeen, Narrogin (s), Nedlands, Ngaanyatjarraku, Northam, Northampton, Nungarin, Port Hedland, Shark Bay
Dairy/ Cheese	City of Perth	Chapman-Valley, Narrogin (T), Peppermint Grove, Perenjori, Pingelly, Plantagenet, Quairading, Ravensthorpe, Rockingham, Sandstone, Serpentine-Jarrahdale, South Perth
Sauces/ Marinades	City of Swan	Cranbrook, Cuballing, Cue, Cunderdin, Victoria Park, Victoria Plains, Vincent, Wagin, Wandering, Waroona, West Arthur, Westonia, Wickepin, Williams, Wiluna
Confectionary (biscuits, Snack Bars etc.)	City of Cockburn	Mandurah, Manjimup, Meekatharra, Menzies, Merredin, Upper Gascoyne, Wongan-Ballidu, Woodanilling, Wyalkatchem, Wyndham/East Kimberley, Wanneroo, Yalgoo, Yilgarn, York
Miscellaneous/ General (e.g. oils, cocoa powder, soups, nuts)	City of Gosnells	Halls Creek, Harvey, Mingenew, Moora, Morawa, Mosman Park, Mt Magnet, Mt Marshall, Mukinbudin, Subiaco, Tammin, Three Springs, Toodyay, Trayning, Wanneroo

Appendix B

For further questions or inquiries about raw data contact LHAAC Coordinator Trevor Chapman:

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