



# LHAAC

LOCAL HEALTH AUTHORITIES ANALYTICAL COMMITTEE

## COORDINATED SAMPLING PROJECT 25

### Imported Foods III

*Conducted March to April 2019 with Local Governments across Western Australia*



Local Health Authorities Analytical Committee

Edith Cowan University

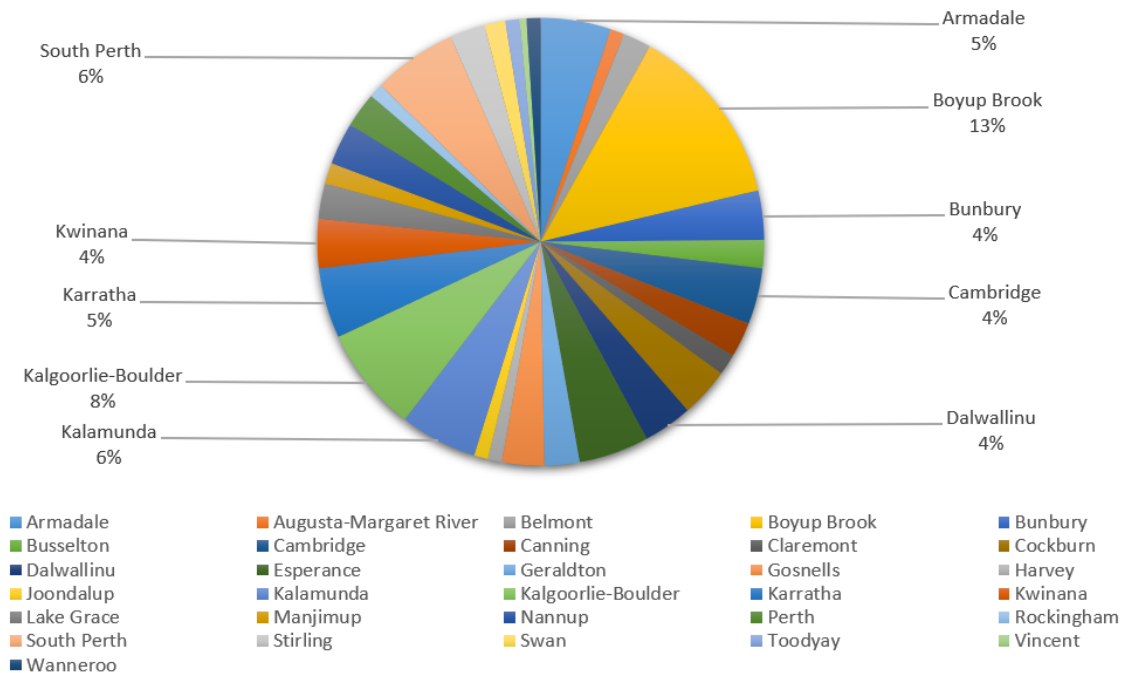
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### Acknowledgements

Thank you to the following Western Australian Local Government Authorities who provided their time and assistance to help execute this project: City of Armadale, Shire of Augusta-Margaret River, City of Belmont, Shire of Boyup Brook, City of Bunbury, City of Busselton, Town of Cambridge, City of Canning, Town of Claremont, City of Cockburn, Shire of Dalwallinu, Shire of Esperance, City of Gosnells, City of Greater Geraldton, Shire of Harvey, City of Joondalup, City of Kalamunda, City of Kalgoorlie-Boulder, City of Karratha, City of Kwinana, Shire of Lake Grace, Shire of Manjimup, Shire of Nannup, City of Perth, City of Rockingham, City of South Perth, City of Stirling, City of Swan, Shire of Toodyay, City of Vincent, and City of Wanneroo.

Number of Submission of each LGA



## Executive Summary

This survey aimed to further support the data collected by past Imported Food related Coordinated Sampling Projects (CSP). The analysis focused specifically on product label content as well as nutritional claims not requiring a reference food.

Western Australian (WA) Environmental Health Officers (EHO) submitted samples for assessment to Agrifood Technology (AT) or Analytical Reference Laboratory (ARL) from March through April 2019. At the end of the sampling period, 31 Local Government Authorities (LGA) had submitted a total of 197 imported food samples to the laboratories for analysis. The labels of all samples were examined for compliance with the FSC. This included food identification; warning statements, advisory statements and declarations; statement of ingredients; date markings of food for sale; nutrition, health and related claims; nutrition information requirements; and legibility requirements. Additionally, samples promoting nutritional claims were tested by the analysts and compared with the FSANZ's 'Conditions for Nutrition Content Claims'.

Upon analysis, test results indicated that approximately 12.2% (n = 11) of the 90 samples which displayed nutritional claims on their packaging did not comply with the Conditions for Nutritional Content Claims – with one sample failing to meet the requirements of two or more compliance areas. Across those samples, a total of 14 failures were recorded over 11 areas of non-compliance. The most common area of non-compliance was 'good source of dietary fibre' which accounted for 21.4% (n = 3), followed by 'preservative free' at 14.3%.

Upon analysis, approximately 65.0% (n = 128) of all labels did not comply with the FSC – with 64 samples failing to meet the requirements of two or more compliance areas. Results indicated a total of 232 labelling compliance failures across 128 non-compliant samples with 'statement of ingredients' found to be the most common area of non-compliance accounting for 26.3% (n = 61), followed by 'nutrition information requirements' at 24.1% (n = 56)

LGAs were requested to review results and undertake further investigation or action where necessary.

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**List of abbreviations**

ARL	Analytical Reference Laboratory
AT	Agrifood Technology
CSP	Coordinated Sampling Project
EHO	Environmental Health Officer
FSANZ	Food Standards Australia and New Zealand
FSC	Food Standards Code
LGA	Local Government Authorities
LHAAC	Local Health Authorities Analytical Committee
NATA	National Association of Testing Authorities
NIPs	Nutrition Information Panels
WA	Western Australia

## 1.0 Background

This is the third Coordinated Sampling Project (CSP) to look at Imported Food. CSP 17 was conducted in 2011/12 and CSP 14 in 2014/15. CSP 25 looks specifically at label content focusing particularly on supplier details, allergen declarations (or lack of) and nutritional claims but does not include the NIP testing undertaken in the two previous surveys. This was done to examine if the results more closely matched the non-compliance rates found by the Imported Food Inspection Scheme administered by the Federal Department of Agriculture, which are consistently lower than previous LHAAC surveys on imported foods for retail sale in WA.

The public of Western Australia has shown strong support for the continued application of food control policies to improve diet and reduce obesity amongst other chronic diseases. In particular, Pollard's study found that 97% of the adult West Australian population supports the continued regulation of food labelling.<sup>1</sup>

Trends in Australia's food market between 1988-89 and 2016-17 showed food imports increased from \$4 billion to \$14 billion (4.8 per cent a year), or from 8 to 15 per cent of food consumption. Monitoring and assessment of these imported foods as well as all foods is of high priority to the public.<sup>2</sup>

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

## 1.1 Introduction

This report summarises the findings from the LHAAC Coordinated Sampling Project (CSP 25) on Imported Foods. Due to the wide range of imported food types available, Local Governments were provided with direction from the LHAAC Coordinator as to the type of products to submit.

This project aimed to assess the labelling and nutritional information on foods that are imported from a range of outlets and across a number of LGAs, and whether they comply with the current FSC.

The main product types that LGAs were asked to select were: Sauces & Marinade, Biscuits & Crackers, Cereal Products, Confectionery Products, Cheeses & Dairy, Seafood Products, Spreads & Condiments, Fruits & Vegetables, Miscellaneous, Dried Products, Bean & Lentil Products, Seasonings, Meat Products and Beverages.

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.<sup>4</sup>

Standard 1.2.2 Food Identification Requirements

- Name of Food clearly stated
- Lot identification
- Name and address of supplier/manufacturer

Standard 1.2.3 Mandatory Warning & Advisory Statements & Declarations

- Allergens Declared

Standard 1.2.4 Labelling of Ingredients

- Ingredients listed on label in correct descending order

Standard 1.2.5 Date Marking of Packaged Food

- Label has best before/ use by date, (if applicable)

Standard 1.2.6 Directions for Use and Storage

- Storage directions on label

Standard 1.2.7 Nutrition, Health & Related Claims

- Health Claims, if any, were analysed

Standard 1.2.8 Nutrition Information Requirements

- NIP laid out as prescribed by standard
- Expressions of quantities in correct format

Standard 1.2.9 Legibility Requirements

- Correct use of font size for warning statements
- Label are in English or have an English Translation (Note: accuracy of translation was not assessed)

Standard 1.2.11 Country of Origin Labelling

- Label has country of origin on it (transferred to consumer protection legislation in 2019)

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.

## **1.2 Food allergy**

A food allergy occurs when a person's immune system reacts to allergens that are harmless to other people.<sup>5</sup> Allergic reactions can range in severity between different people.<sup>5</sup> Symptoms of a mild immune reaction can include hives, vomiting or abdominal pain.<sup>5</sup> Severe allergic reaction can cause swelling of the throat or tongue, wheezing, dizziness or breathing complications.<sup>5</sup> In extreme cases, allergic reaction can cause anaphylaxis which can possibly result in death. It is estimated that ten people die per year from anaphylactic reactions in Australia.<sup>6</sup> The consumer has the right to access accurate information regarding the contents of their purchased food. A person may wish to avoid certain food due to religious, cultural or ethical beliefs. Furthermore, consumers may need to avoid food types due to the risk of poor health effects in those affected by food allergies, food intolerances or coeliac disease.

A recent study confirmed that undeclared allergens can be frequently detected in imported packaged foods from Asia.<sup>7</sup> Those products containing undeclared allergen failed to provide mandatory allergen declarations on the label in English or in terminology consistent with the Code.<sup>7</sup>

In line with these findings, an Australian survey of allergy clinicians, conducted over a three-month period, reported 14 incidents of anaphylaxis due to suspected consumption of packaged food containing undeclared allergens.<sup>7</sup>

## **2. Methodology**

Sampling instructions were supplied to WA LGAs. Both metropolitan and non-metropolitan LGAs were encouraged to participate in this CSP if suitable products were available in their locality. The sampling instructions provided LGAs with a guide to determine the optimal number of samples to be collected, based on the population size of each LGA (Table 1). Ultimately, the number of samples that were collected was determined by each LGA in consideration of their own sampling allowance and other activity planned or anticipated for the financial year.



*Table 1. The recommended number of samples suggested to be collected by participating LGAs*

LGA Population	Recommended Number of Samples to be Collected
1 - 2000	2
2001 – 10,000	4
10,001 – 50,000	6
> 50,0000	10 (maximum)

The sampling instructions also included a schedule to ensure that a variety of product categories were included for analysis. Each of these categories were allocated to one lead LGA (a major user of the LHAAC sampling scheme) and multiple smaller LGAs. The products to be sampled were selected at the discretion of each participating LGA.

Samples of imported foods from across WA were submitted to either AT or ARL, the two appointed analysts to the LHAAC, between March and April 2019. The minimum sample size for submission to the analysts was 200 grams or 200 millilitres.

The labels of all samples were examined for compliance with the FSC. This included food identification; warning statements, advisory statements and declarations; statement of ingredients; date markings of food for sale; nutrition, health and related claims; nutrition information requirements and legibility requirements. Upon completion, LGAs were requested to review the results. Recommended follow-up actions were provided to each LGA within the sampling instructions.

### 3. Results

By the end of the sampling period, 31 Local Government Authorities (LGA) had submitted a total of 197 samples across 14 product categories to the laboratories for analysis (Figure 1.). Sample distribution indicated that 14.7% ( $n = 29$ ) of samples were sauces and marinades; 13.2% ( $n = 26$ ) were biscuits and crackers; 12.7% ( $n = 25$ ) were cereal products, which included rice, noodles, pasta, and other related items; 8.6% ( $n = 17$ ) were confectionary products, which included snack items; 7.6% ( $n = 15$ ) were cheeses and dairy; 7.1% ( $n = 14$ ) were seafood products; 7.1% ( $n = 14$ ) were spreads and condiments; 6.6% ( $n = 13$ ) were fruits and vegetables; 4.6% ( $n = 9$ ) were dried products; 4.6% ( $n = 9$ ) were bean and lentil products; 4.1% ( $n = 8$ ) were seasonings; 2% ( $n = 4$ ) were meat products; and 2% ( $n = 4$ ) were beverages. 5.1% ( $n = 10$ ) of samples were classified as miscellaneous items as they did not easily fit into a product category in their own right.

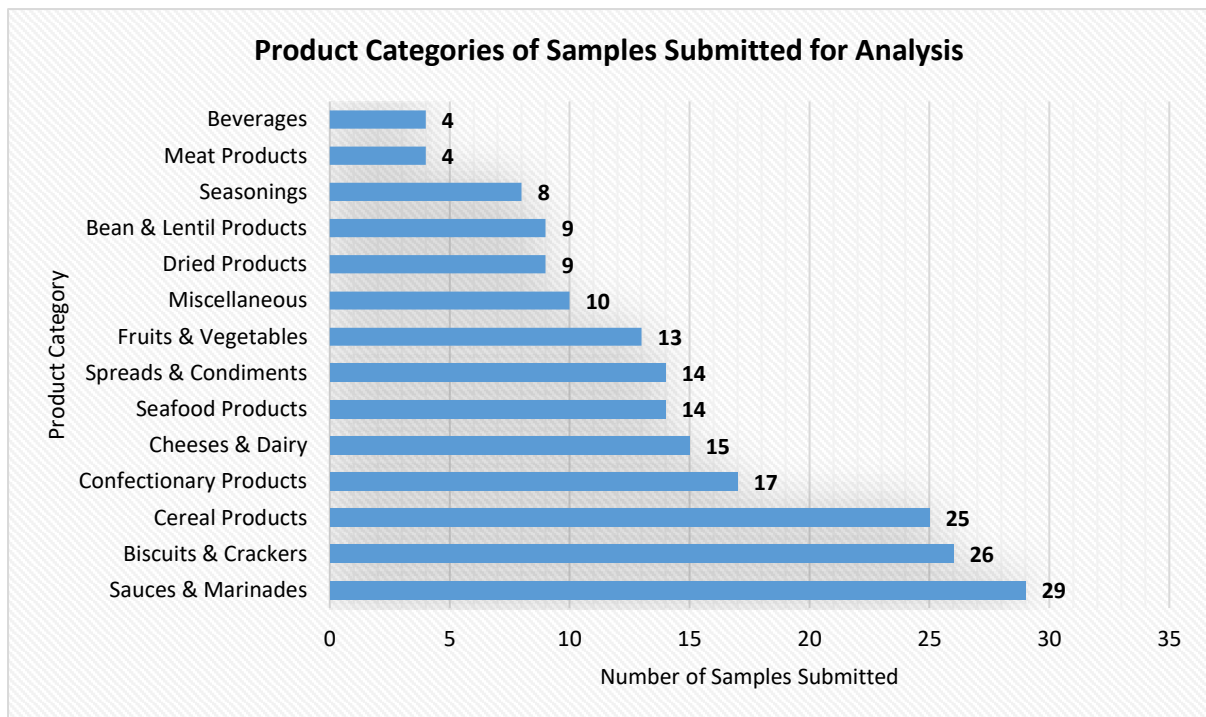


Figure 1.

#### 3.1 Nutritional Claim Compliance

Of the 197 submissions to the analysts, 90 samples displayed nutritional claims on their packaging – with a total of 151 claims recorded across those samples. 30 nutritional claim descriptors were utilised by the various

manufacturers. These descriptors included: gluten free; preservative free; low fat, fat free, saturated fat free, and trans-fat free; cholesterol free; source of dietary fibre, good source of dietary fibre, and excellent source of dietary fibre; source of protein, and good source of protein; lactose free; egg free; nut free; low glycaemic index (G.I.); meat free; dairy free; low sugar, and sugar free; soy free; low sodium, no added sodium, and sodium free; source of omega 3, and good source of omega 3; monosodium glutamate (MSG) free; no artificial colours; source of vitamin A; and source of vitamin C.

Each descriptor was tested for by the analysts and compared against Food Standards Australia New Zealand's (FSANZ) Conditions for Nutritional Content Claims (Appendix B) [1]. Results indicated 'gluten free' to be most common nutritional claim descriptor, accounting for 23.2% ( $n = 35$ ) of all claims, followed by 'preservative free' at 14.6% ( $n = 22$ ) (Figure. 2).

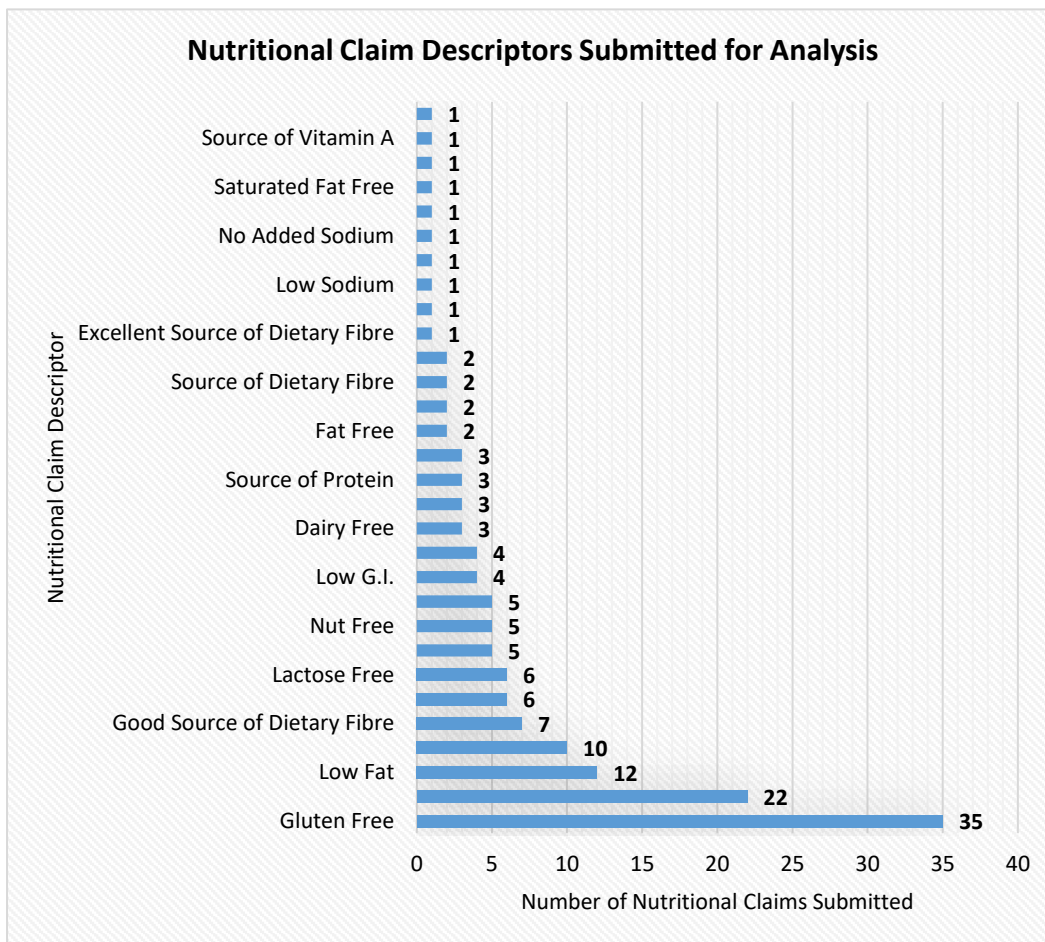


Figure 2.

Upon analysis, test results indicated that 12.2% ( $n = 11$ ) of the 90 samples which displayed nutritional claims on their packaging did not comply with the Conditions for Nutritional Content Claims – with one sample failing to

meet the requirements of two or more compliance areas. Across those samples, a total of 14 failures were recorded over 11 areas of non-compliance. The most common area of non-compliance was 'good source of dietary fibre' which accounted for 21.4% ( $n = 3$ ), followed by 'preservative free' at 14.3% ( $n = 2$ ) (Table 2.).

Table 2. Nutritional Claim Descriptors Associated with Compliance Failures

Nutritional Claim Descriptor	Number of Nutritional Claim Compliance Failures
Good Source of Dietary Fibre	3
Preservative Free	2
Cholesterol Free	1
Good Source of Protein	1
Low Fat	1
MSG Free	1
Source of Dietary Fibre	1
Source of Vitamin A	1
Source of Vitamin C	1
Sugar Free	1
Trans Fat Free	1
<b>Total</b>	<b>14</b>

Of the 14 compliance failures, 28.7% ( $n = 4$ ) were dried products, 21.4% ( $n = 3$ ) were cereal products, 21.4% ( $n = 3$ ) were confectionary items, 14.3% ( $n = 2$ ) were sauces and marinades, 7.1% ( $n = 1$ ) were biscuits and crackers, and 7.1% ( $n = 1$ ) were spreads and condiments (Figure 3.).

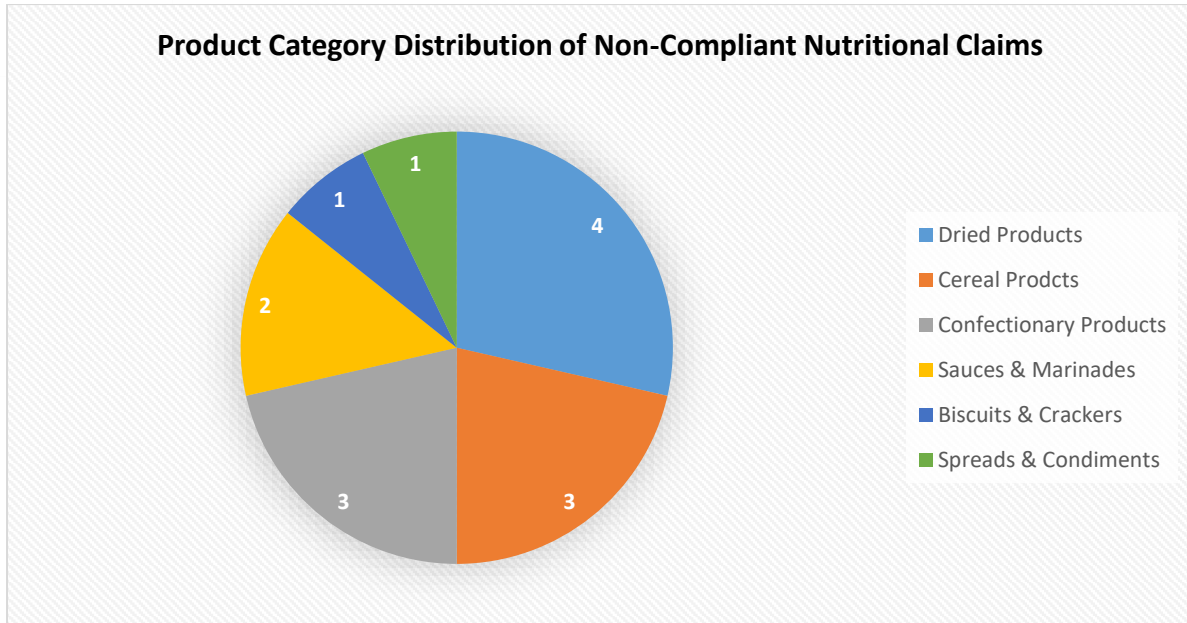


Figure 3.

### 3.2 Labelling Compliance

The labels of all 197 samples were scrutinised by the analysts and compared against the requirements detailed in FSANZ's Food Standards Code (FSC) [2]. Each sample was checked for the following areas of compliance: food identification; warning statements, advisory statements and declarations; statement of ingredients; date markings of food for sale; nutrition, health and related claims; nutrition information requirements; and legibility requirements. Upon analysis, approximately 65.0% ( $n = 128$ ) of all labels did not comply with the FSC – with 64 samples failing to meet the requirements of two or more compliance areas. Results indicated a total of 232 labelling compliance failures across 128 non-compliant samples with 'statement of ingredients' found to be the most common area of non-compliance accounting for 26.3% ( $n = 61$ ), followed by 'nutrition information requirements' at 24.1% ( $n = 56$ ) (Table 3).

Table 3. Areas of Labelling Compliance Associated with Compliance Failures

Area of Labelling Compliance	Number of Labelling Compliance Failures
Statement of Ingredients	61
Nutrition Information Requirements	56
Legibility Requirements	53
Date Markings of Food for Sale	35
Warning Statements, Advisory Statements and Declarations	21
Food Identification	6
<b>Total</b>	<b>232</b>

Of the 128 non-compliant samples, approximately 18.0% ( $n = 23$ ) were sauces and marinades, 14.1% ( $n = 18$ ) were cereal products, 10.9% ( $n = 14$ ) were biscuits and crackers, 7.8% ( $n = 10$ ) were confectionary products, 7.8% ( $n = 10$ ) were seafood products, 6.3% ( $n = 8$ ) were fruits and vegetables, 6.3% ( $n = 8$ ) were miscellaneous items, 5.5% ( $n = 7$ ) were cheeses and dairy, 4.7% ( $n = 6$ ) were bean and lentil products; 4.7% ( $n = 6$ ) were spreads and condiments; 3.9% ( $n = 5$ ) were dried products; 3.9% ( $n = 5$ ) were seasonings; 3.1% ( $n = 4$ ) were beverages; and 3.1% ( $n = 4$ ) were meat products (Figure 4).

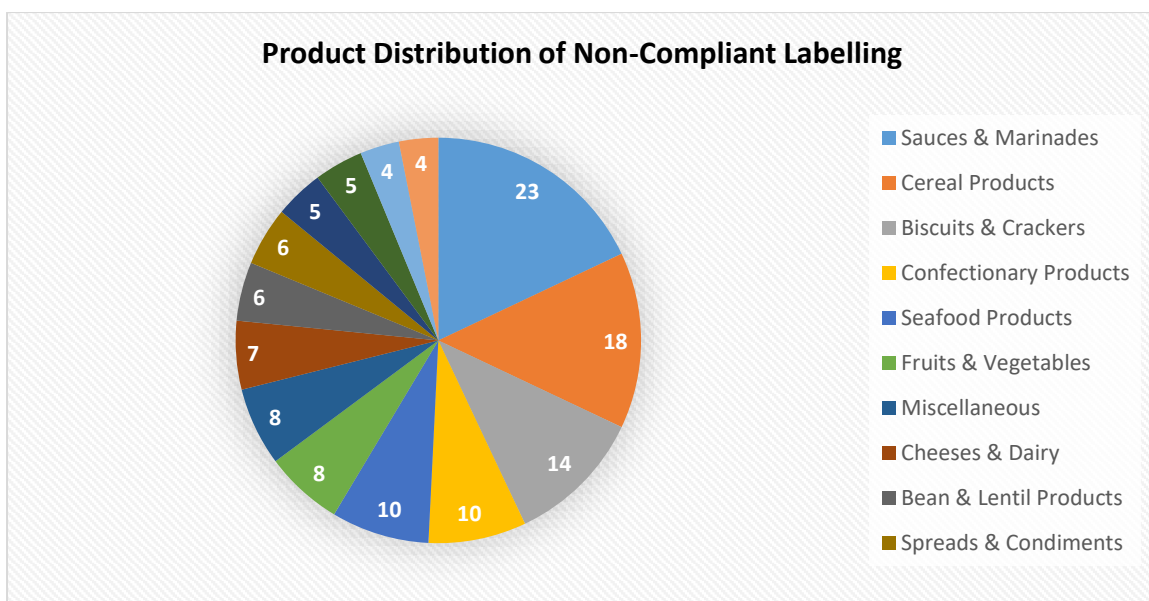


Figure 4.

## **4.0 Discussion**

### **4.1 Nutritional Claim Compliance**

90 of the 197 samples submitted displayed Nutritional Claims, with several having more than one nutritional claim. This generated a total of 151 Nutritional Claims from the 197 samples. 12.2% (n=11) of the 90 displaying Nutritional Claims did not comply with the Conditions for Nutrient Content (FSC). A few of these were due to the product claiming higher sources of the nutrient on their Nutritional Panel, but this was disproved with the analysis. Other products stated values that matched our analysis results, however the wording around their claim meant they were non-compliant with the Code. Many of the non-compliance products would have met the guidelines with a 100g serving, however this was not the listed serving stated on the label.

### **4.2 Labelling Compliance**

128 (65%) of the 197 samples submitted did not comply with FSC labelling requirements. This compared to a 95% level of non-compliance in the 2014 Imported Foods II study (CSP 14) which also included analysis of NIP values.

As this CSP focussed specifically on labelling compliance and any Nutritional Claims made on the packaging it is difficult to make comparisons with previous Imported Food Studies. What cannot be disputed is the high level of inconsistency in both Nutritional Claims and Label Compliance.

As more and more consumers look to NIP's and general labelling for information on the product they purchase, it is concerning that such high levels of inconsistency are still found in the Imported Foods area.

#### **4.2.1 Nutritional Information**

43.7% of non-compliant samples (56 of 128) did not meet the specific requirements for Nutritional Information Panels (NIP's) as set out by the Food Standards Code. 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. Nutrition Panels had varying degrees of compliance. The most common issue was with the per 100g value not being listed. It has been reported by Mhurchu and Gorton, that the nutritional information panel is most often

utilized by consumers for family members or themselves in relation to weight management goals or those who have specific dietary requirements.<sup>7</sup> It is of vital importance that this information is as accurate as possible when it is perused by consumers before purchase. The nutritional information panel 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.<sup>7</sup>

#### **4.2.2 Legibility**

Non-compliance in this area largely relates to the size of font used on the label. Many labels used fonts smaller than the prescribed size, using a font size closer to that permitted on small packaging. 53 of 128 non-compliant samples (41.4%) failed in this study.

According to a 2016 French study, an interaction effect was identified between age and level of education regarding legibility of mandatory and nutrition information.<sup>9</sup> The most impacted by low degree of package information legibility (typically the elderly with the lowest level of education) were also the most vulnerable to health issues.<sup>9</sup>

#### **4.2.3 Date markings**

Date Markings were varied in what was supplied. Some packages contained a manufacturer but no best before, others contained lot numbers but no dates. 35 of 128 non-compliant samples (27%) failed date marking requirements in this study. Food with a use by date cannot be sold past this date. However, food can be legally sold after the best before date provided it is not damaged, deteriorated or perished and is clearly marked as being past its best before date.<sup>10</sup>

#### **4.2.4 Listed Ingredients**

The finding of listed ingredients was significant. This resulted in 47.6% (n=61) of non-compliant samples in this study. Some products listed no ingredients at all or did not supply a label. The hidden ingredients could potentially harm the consumers. For example, the foods high in sugar, salt or fat are disadvantageous for individuals with chronic diseases (hypertension, hypercholesterolemia, diabetes or at risk of diabetes, obesity, and heart disease).



#### **4.2.5 Mandatory Declarations**

Products failing Mandatory Declarations had ingredients known as allergens but did not list this as a warning anywhere on the package. 21 of 128 non-compliant samples (16.4%) failed in mandatory declarations. Food allergy is a specific immunological adverse reaction to a trigger food while food intolerance is a form of non-immunologically mediated reaction.<sup>11</sup> Examples of food intolerance include lactose intolerance where the individual lacks the ability to produce sufficient lactase needed to digest lactose. Food allergies can cause life-threatening anaphylactic reactions and reduce the quality of life of individuals with food allergies.<sup>11</sup> 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, these findings directly impact a large portion of the population.<sup>11</sup> The only current treatment for food allergies is to avoid the trigger food. This relies on accurate and clear declaration of allergens in ingredient list and unambiguous precautionary allergen labelling to inform consumers regarding the presence of allergens.

#### **4.2.6 Food Identification**

Non-compliance rates for Food Identification were quite low with 6 of 128 non-compliant samples (3%) failing in this area. The products that did fail in this category either did not state what that product was in English or did not contain an Australian importer.

## 5.0 Conclusion

This CSP 25 looked specifically at label content focusing particularly on supplier details, allergen declarations and nutritional claims. It demonstrated a reasonable result in nutritional claim compliance with 12% (n=11) of the 90 displaying nutritional claims which did not comply with the Conditions for Nutrient Content.

However, this CSP has established that there remains a high degree of inconsistencies amongst our imported food products in Western Australia as 128 (65%) of the 197 samples submitted did not comply with FSC in some way. The non-compliant labels included Statement of Ingredients (31%), Nutrition Information Requirements (28%), Legibility Requirements (27%), Date Markings of Food for Sale (18%), Warning Statements, Advisory Statements and Declarations (11%) and Food Identification (3%). 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 food sold in Western Australia.

The relevant LGAs were informed of inconsistent samples. The following suggested actions on non-complying products was provided to LGAs to assist in follow-up action:

1. Inform the retail outlet in writing that the relevant product did not comply with the Code.
2. When the importer is based in WA, write to the importer and the Local Government Authority in which the importer is located.
3. In situations where the product is not imported directly into WA, the details of the non-compliance should be sent to the Department of Health who may pass the information to the correct enforcement agency in the State or Territory in which the importer 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 importer for a product that does not comply with the Code. Where only the retail outlet is within the LGA's area, this enforcement action can only be taken for sale of a product that does not comply with the Code.

## 6.0 References

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**Appendix A**

Raw Data

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## Appendix B

Table 4. An adaptation of FSANZ's Conditions for Nutrition Content Claims [1].

Nutritional property of food	Nutritional claim descriptor	Conditions that must be met if using nutritional claim descriptor
Cholesterol	Free	The food contains no detectable levels of cholesterol.
Dietary fibre	Source	A serving of the food contains at least 2 g of dietary fibre.
	Good source	A serving of the food contains at least 4 g of dietary fibre.
	Excellent source	A serving of the food contains at least 7 g of dietary fibre.
Fat	Free	The food contains no detectable levels of fat.
	Low	The food contains no more fat than: (a) 1.5 g/100 mL for liquid food; or (b) 3 g/100 g for solid food.
Saturated fat	Free	(a) The food contains no detectable saturated fatty acids; and (b) The food contains no detectable trans fatty acids.
Trans fat	Free	The food contains no detectable trans fatty acids, and contains: (a) no more than: i. 0.75 g saturated fatty acids/100 mL of liquid food; or ii. 1.5 g saturated fatty acids/100 g of solid food; or (b) No more than 28% saturated fatty acids as a proportion of the total fatty acid content.

Omega-3	Source	<p>(a) The type of omega fatty acid is specified immediately after the word 'omega'; and</p> <p>(b) the food contains no less than:</p> <ul style="list-style-type: none"> <li>i. 200 mg alpha-linolenic acid per serving; or</li> <li>ii. 30 mg total eicosapentaenoic acid and docosahexaenoic acid per serving; and</li> </ul> <p>(c) other than for fish or fish products with no added saturated fatty acids, the food contains:</p> <ul style="list-style-type: none"> <li>i. as a proportion of the total fatty acid content, no more than 28% saturated fatty acids and trans fatty acids; or</li> <li>ii. no more saturated fatty acids and trans fatty acids than 5 g per 100 g</li> </ul>
	Good Source	<p>(a) The food contains no less than 60 mg total eicosapentaenoic acid and docosahexaenoic acid/serving; and</p> <p>(b) The food may contain less than 200 mg alpha-linolenic acid/serving.</p>
Gluten	Free	<p>The food must not contain:</p> <ul style="list-style-type: none"> <li>(a) detectable gluten; or</li> <li>(b) oats or oat products; or</li> <li>(c) cereals containing gluten that have been malted, or products of such cereals.</li> </ul>
Glycaemic Index	Low	The numerical value of the glycaemic index of the food is 55 or below.
Lactose	Free	The food contains no detectable levels of lactose.



Protein	Source	The food contains at least 5 g of protein/serving.
	Good Source	The food contains at least 10 g of protein/serving.
Sodium	No added	(a) The food contains no added sodium compound including no added salt; and (b) The ingredients of the food contain no added sodium compound including no added salt.
	Low	The food contains no more sodium than: (a) 120 mg/100 mL for liquid food; or (b) 120 mg/100 g for solid food.
Sugar	No added	(a) The food contains no added sugars, honey, malt, or malt extracts; and (b) the food contains no added concentrated fruit juice or deionised fruit juice, unless the food is any of the following:  i. a brewed soft drink; ii. an electrolyte drink; iii. an electrolyte drink base; iv. juice blend; v. a formulated beverage; vi. fruit juice; vii. fruit drink; viii. vegetable juice; ix. mineral water or spring water; x. a non-alcoholic beverage.
	Low	The food contains no more sugars than:

		<p>(a) 2.5 g/100 mL for liquid food; or</p> <p>(b) 5 g/100 g for solid food.</p>
<p>Vitamin or mineral (not including potassium or sodium)</p>	<p>Source</p>	<p>(a) The vitamin or mineral is mentioned in Column 1 of the table to section S1—2 or S1—3; and</p> <p>(b) a serving of the food contains at least 10% RDI or ESADDI for that vitamin or mineral; and</p> <p>(c) a claim is not for more of the particular vitamin or mineral than the amount permitted by section 1.3.2—4 or 1.3.2—5; and</p> <p>(d) the food is not any of the following:</p> <ul style="list-style-type: none"> <li>i. a formulated caffeinated beverage;</li> <li>ii. food for infants;</li> <li>iii. a formulated meal replacement;</li> <li>iv. a formulated supplementary food;</li> <li>v. a formulated supplementary sports food.</li> </ul>