

Response ID ANON-KGW5-JA5B-Z

Submitted to Public Consultation: Industrially-produced trans fats in processed foods - EXTENDED
Submitted on 2023-09-29 13:23:28

About you

Submitter information

Full name:
Fiona Fleming

Yes

Name of organisation:
Australian Institute of Food Science and Technology

What sector do you represent?:
Other

Which country are you responding from?:
Australia

If you selected 'other' please specify country:

Please provide your email address.:
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An opportunity to provide any other information about your organisation you would like to provide.:

The Australian Institute of Food Science and Technology (AIFST) is a not-for-profit organisation representing food science professionals working in all facets of the agrifood industry including food science, food technology, engineering, sensory, new product development, innovation, regulatory, QA, nutrition, microbiology, and food safety.

AIFST's mission is to advance and inspire all food sector professionals through education, collaboration, and recognition, to champion a robust, innovative, science-based Australian food industry to meet future food needs.

If we require further information in relation to this submission, can we contact you?:
Yes

Privacy and confidential information and permissions

No

If you want all or parts of this submission to be confidential, please state why.:

Have you read the Consultation Options Paper?

Have you read the Policy Options Paper: Improving the composition of the food supply in relation to industrially-produced trans fats? (Please click on the link above to open the document)

Yes

Section 1: Introduction and Statement of the Problem

1 Are there any other estimates of the contribution of trans fat consumption to heart disease in Australia or New Zealand? Please provide references for your response.

Not Answered

If yes, please provide details here and justify with evidence.:

AIFST is not aware of other estimates of the contribution of trans fat consumption to heart disease in Australia or New Zealand.

We are concerned that the link between the impact of trans fats consumption amongst vulnerable population groups and CHD is limited - not providing a sound scientific basis on which to make recommendations.

Please attach references here:
No file uploaded

Not Answered

2 Is there further data on intake of trans fats in Australia or New Zealand, either at the population level, or population groups? Please provide references for your response.

Not Answered

If yes, please provide details here and justify with evidence.:

AlFST is not aware of further data on intake of trans fats in Australia or New Zealand, either at the population level, or population groups.

We are concerned that recent data available is limited - not providing a sound scientific basis on which to make recommendations.

Please attach references.:

No file uploaded

Not Answered

3 Food manufacturers- Do you have additional data on trans fat content of foods in Australia or New Zealand? Data for individual foods and food companies will be used to inform option analysis but will not be published.

Not Answered

If yes, please provide details here and justify with evidence.:

AlFST is not aware of further data on on trans fat content of foods in Australia or New Zealand.

We are concerned that data available is limited - not providing a sound scientific basis on which to make recommendations.

Please attach references. :

No file uploaded

Not Answered

Section 2a: Actions underway in Australia and New Zealand to support consumers to limit consumption of trans fats

4a Is there any data available on the number or proportion of products that declare trans fat content in the Nutrition Information Panel for Australia and/or New Zealand?

Not Answered

If yes, please provide details here and justify with evidence.:

This is only a requirement for those products making a claim about fat.

Please attach references here:

No file uploaded

Not Answered

4b Is there any data available on the number or proportion of products that declare hydrogenated oils in the Statement of Ingredients for Australia and/or New Zealand?

Not Answered

If yes, please provide details here and justify with evidence.:

References for data available on the number or proportion of products that declare hydrogenated oils in the Statement of Ingredients for Australia and/or New Zealand:

No file uploaded

Not Answered

4c Food manufacturers- what information do you provide to consumers about the trans fat content of your food products?

Not Answered

If yes, please provide details here and justify with evidence.:

Please attach references here:

No file uploaded

Not Answered

Section 2b: Reformulation activities to reduce trans fat in foods in Australia and New Zealand

5a Food manufacturers- what reformulation activities have you undertaken in the last 10 years to reduce the use of trans fats/partially-hydrogenated vegetable or fish oils?

Not Answered

If yes, please provide details here and justify with evidence.:

Food manufacturers exporting product will have already reformulated to meet their customer requirements if it has been necessary.

Please attach references here:

No file uploaded

Not Answered

5b Food manufacturers- What has been the impact of cooking oil price increases and supply shortages on your products? What alternate oils are being used?

Not Answered

If yes, please provide details here and justify with evidence.:

Please attach references here:

No file uploaded

Not Answered

Section 3: Objectives

6 Do you agree with the proposed objective of this work?

Not Answered

If not, what is your proposed alternative?:

The objective as written does not acknowledge the association documented in the discussion paper in relation to the impact of CHD.

With a lack of current intake and usage data available, it could be proposed that this objective requires further research to support the link between trans fat consumption and health outcomes in remote and indigenous communities.

How will the objective be measured when the baseline data is minimal?

Please attach references here:

No file uploaded

Not Answered

Section 4: Options

7 Are there additional policy options that should be considered? Please provide rationale and the benefits and risks of your suggested option.

Yes

Please provide rationale and the benefits and risks of your suggested option. :

AIFST suggest that further data collection and analysis need to be considered.

Please attach references here:

No file uploaded

Not Answered

Section 4.1: Policy Option 1 - Status Quo

8a Are the risks and limitations associated with the status quo described appropriately?

Not Answered

If no, please provide details here and justify with evidence.:

The risks and limitations put forward with the status quo are associated with no recent facts about the current situation. When last reviewed by FSANZ, it was decided that there was no value in a further survey. Therefore until there is proper data, there is no issue to be addressed.

Countries that have already eliminated trans fats are unlikely to manufacture products specifically for the Australian market as it adds complexity to their business. They are most likely to use their usual formulas.

Please attach references here:

No file uploaded

Not Answered

8b Are there additional risks that have not been identified?

No

If yes, please provide details below.:

Please attach references here:

No file uploaded

Not Answered

Section 4.2: Policy Option 2 - Voluntary reformulation

9a Are the risks and limitations associated with Option 6.2 described appropriately?

No

If no, please provide details here and justify with evidence.:

The risks and limitations of this option are that this is a lot of work when the actual amount of trans fats in Australian manufactured products is well below WHO standards.

The last analytical survey taken was over 10 years ago (to many of the references cited contain conjecture rather than data).

A survey of the major oil processors will indicate how much is actually being produced for the food industry and therefore whether this needs to be further addressed.

Please attach references here:

No file uploaded

Not Answered

9c Food manufacturers- How likely are you to be involved in this voluntary reformulation program? How many products are likely to be reformulated?

Please provide details below.:

Please attach references here:

No file uploaded

Not Answered

9d Food manufacturers- how would this option impact you (include cost estimates where available)? What would be a suitable time frame for this option to be implemented in your organisation.

Please provide details below.:

Please attach references here:

No file uploaded

Not Answered

9b Are there additional risks and limitations that have not been identified?

Not Answered

If yes, please provide details below.:

Please attach references here:

No file uploaded

Not Answered

9e What implementation issues need to be considered for this option?

Please provide details below.:

Please attach references here:

No file uploaded

Not Answered

Section 4.3: Policy Option 3 - Regulatory limits for industrially-produced trans fats in processed foods

10a Are the risks and limitations associated with Option 6.3 described appropriately?

Not Answered

If no, please provide details below.:

The risks and limitations of this option are that this is a lot of work when the actual amount of trans fats in Australian manufactured products is well below WHO standards.

The last analytical survey taken was over 10 years ago.

A survey of the major oil processors will indicate how much is actually being produced for the food industry and therefore whether this needs to be further addressed.

Those companies currently exporting have already addressed removal of trans fats to meet standards in those countries and thus Australian product has been addressed at the same time.

A survey of oil processors will give a good estimate as to whether this problem exists and if so the size of the problem.

Please attach references here:

No file uploaded

Not Answered

10b Are there additional risks that have not been identified?

Not Answered

If yes, please provide details below.:

Please attach references here:

No file uploaded

Not Answered

10c Food manufacturers- how would this option impact you (include cost estimates where available)? How many SKUs would be affected? What would be a suitable time frame for this option to be implemented in your organisation.

Food manufacturers- how would this option impact you (include cost estimates where available)? How many SKUs would be affected? What would be a suitable time frame for this option to be implemented in your organisation.:

Please attach references here:

No file uploaded

Not Answered

10d What implementation issues need to be considered for this option?

What implementation issues need to be considered for this option?:

Please attach references here:

No file uploaded

Not Answered

10e Food manufacturers- what oils you most likely to use in place of partially hydrogenated oils?

Food manufacturers- what oils you most likely to use in place of partially hydrogenated oils?:

Please attach references here:

No file uploaded

Not Answered

Section 4.4: Policy Option 4 - Prohibiting use of partially-hydrogenated oils in processed foods

11a Are the risks and limitations associated with Option 6.4 described appropriately?

No

If no, please provide details below.:

The risks and limitations of this option are that this is a lot of work when the actual amount of trans fats in Australian manufactured products is well below WHO standards.

The last analytical survey taken was over 10 years ago.

A survey of the major oil processors will indicate how much is actually being produced for the food industry and therefore whether this needs to be further addressed.

Those companies currently exporting have already addressed removal of trans fats to meet standards in those countries and thus Australian product has been addressed at the same time.

A survey of oil processors will give a good estimate as to whether this problem exists and if so the size of the problem.

Please attach references here:

No file uploaded

Not Answered

11b Are there additional risks that have not been identified?

Not Answered

If yes, please provide details below.:

Please attach references here:

No file uploaded

Not Answered

11c Food manufacturers- how would this option impact you (include cost estimates where available)? How many SKUs would be affected? What would be a suitable time frame for this option to be implemented in your organisation.

Food manufacturers- how would this option impact you (include cost estimates where available)? How many SKUs would be affected? What would be a suitable time frame for this option to be implemented in your organisation.:

Please attach references here:

No file uploaded

Not Answered

11d What implementation issues need to be considered for this option?

What implementation issues need to be considered for this option?:

Please attach references here:

No file uploaded

Not Answered

11e Food manufacturers- what oils you most likely to use in place of partially hydrogenated oils?

Food manufacturers- what oils you most likely to use in place of partially hydrogenated oils?:

Please attach references here:

No file uploaded

Not Answered

Section 4.5: Options considered but not pursued

12 Do you agree that these options should not be pursued further?

Not Answered

Please provide details below.:

The other options shown do not contain sufficient merit to be worth pursuing, and also suffer from the lack of real data.

Please attach references here:

No file uploaded

Not Answered

Section 4.6 Assessment of how well the proposed policy options achieve the objective of this work

13 Do you agree with the analysis of how well the proposed options would achieve the proposed objective?

If yes, please provide details here and justify with evidence. If not, please describe why and provide evidence.:

AIFST does not agree that the analysis supports how well the proposed options would achieve the proposed objective.

AIFST agrees that the incidence of CHD is a public health issue. It is asserted that there is a link between trans fats and heart disease, although how strong this is could be challenged.

Sourcing current and relevant data may show that a significant problem does not exist.

In order to monitor the effectiveness of any intervention, the baseline data available needs to be current and relevant otherwise progress toward the stated objective cannot be measured.

Please attach files here:

No file uploaded

Section 5: Impact analysis (costs and benefits)

14a Do you agree with the description of the possible benefits associated with the proposed options?

Not Answered

Please provide details below.:

Please attach references here:

No file uploaded

Not Answered

14b Are there additional benefits associated with all or some of the proposed options that have not been captured? Please provide references for your response.

Not Answered

Are there additional benefits associated with all or some of the proposed options that have not been captured? Please provide references for your response. :

Please attach references here:

No file uploaded

Not Answered

15 Are there additional costs associated with all or some of the proposed options that have not been captured? Please explain your rationale and your calculations.

Not Answered

If yes, please explain your rationale and your calculations.:

Please attach references here:

No file uploaded

Not Answered

Section 6: Preferred option

16 What do you consider to be the preferred policy option(s) to recommend to Food Ministers? Please explain your rationale.

Please explain your rationale:

The AIFST does not support progressing this work further until sound and current baseline data is collected and collated.

Decision making based on incomplete and out of date information which is not reflective of contemporary food manufacturing practices is not appropriate.

Please attach references here:

No file uploaded

Not Answered

Section 7: Implementation and review

17 Do you have any other comments on this document?

Do you have any other comments on this document? :

The AIFST advocates for sound science to underpin decision making across the agrifood system.

Sound science relies on up to date information which relates directly to the problem to be addressed.

Decision making based on out of date information is not best practice and should not be supported.

Please attach references here:

No file uploaded

Not Answered