

Critical Analysis of the Food Industry Taskforce on Addressing Factors Contributing to Obesity Recommendations and the Government's response

Analysis prepared by the Health Coalition Aotearoa
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Summary comments on industry report

This assessment of the 51 food industry recommendations is based on a 2017 [report](#) and peer-reviewed [publication](#) on the progress by the top 25 food companies in New Zealand, including manufacturers, retailers and fast food outlets. This highly relevant, independent study was not cited in the industry's report.

It is important to note the following general points:

1. **The solution to the obesity and chronic disease epidemics** in New Zealand is a comprehensive approach that involves state-of-the-art government regulation (eg, on food marketing restrictions and setting maximum sugar and sodium levels in processed foods) and use of fiscal instruments (eg, taxes on sugary drinks and junk foods). It will also require infrastructure expenditure to support more active transport (eg, walking and cycling to work). The role of the food industry will remain in generating profit and returning shareholder value – which generally has little to do with protecting the health of NZ citizens and protecting children from exploitation. As such, the Government needs to exert caution in partnering with the food industry (an cautious approach that was finally adopted with the tobacco industry after wasting decades with ineffectual voluntary agreements). The main role of the food industry in promoting health is to implement government policies and to refrain from lobbying to undermine prevention policy development.
2. **Nutrition surveys** – these are of the highest priority, but they do not belong in a report on industry commitments as these are the responsibility of central government.
3. **SMART policy commitments** – Government needs to push hard to get all food companies to develop and post their nutrition policies which include marketing to children, food labelling and reformulation. These should be independently monitored for quality and comprehensiveness. Current company commitments are very few and very vague.
4. **Product reformulation** (making ultra-processed foods slightly less obesogenic) **will not** be a major contributor to reducing obesity – it is a

minor strategy. For sodium reduction, product reformulation has much more potential as per evidence from the UK.

5. **Serving sizes** – this is purely an industry agenda with no validity in evidence or backed by any authoritative report on obesity prevention.
6. **Company wellness programmes** – these should be business-as-usual for large, responsible companies and responsible industry associations could support wellness programmes in small and medium enterprises (SMEs).
7. **Education** – it is highly inappropriate and ethically problematic for companies selling ultra-processed foods to be “educating” New Zealand children about nutrition. It is astounding how much they are doing this already and this speaks to substantive NZ Government failure to take nutrition education seriously and to protect children from highly unethical commercial exploitation.
8. **Marketing** – this absolutely requires NZ Government regulation because the ASA code is far too flawed to be repaired. Fiddling at the edges of the code is a distraction. Getting all companies to publish their marketing to children policies is an important accountability step.
9. **Independent monitoring** – there was no mention of independent monitoring for accountability.
10. **Members** – there was no list of signed up companies and associations and perpetrates the secrecy of membership approach taken by the Food and Grocery Council.
11. **Financial disclosures** – there was no commitment to financial disclosures of funding to researchers, funding to political parties, funding to community and other groups, funding of nutrition programmes. This is critical for transparency to assess conflicts of interest.

Summary of the analysis by the Health Coalition Aotearoa

Health Coalition assessment	Number of recommendations from the Food Industry Taskforce	Government-signalled priorities
Agree but not counted as an industry commitment (ie, a Government responsibility)	3	0
Agree	1	1
Agree if strengthened	12	8
'Smoke and mirrors' 1 (business-as-usual)	12	4
'Smoke and mirrors' 2 (distraction)	14	1
'Smoke and mirrors' 3 (potential for harm)	9	0
Total	51	14

Comments on the NZ Government responses to the industry report

- The NZ Government's response to this industry report is incredibly delayed with no reason was given for the 11-month delay. This is completely inappropriate given the health burden, inequalities burden and health system cost burden from the obesity and chronic diseases epidemics in this country.
- The Government's response was framed mainly in congratulatory terms with soft recommendations for industry to encourage further reviews of specific areas.
- The letter implies that the Government is happy with the report when, in fact, the majority of the recommendations are simply 'smoke and mirrors' and the actionable ones are weak.
- The industry report and the Government's response give no confidence that sufficient actions will be taken to create healthier food environments and help reduce obesity.
- The recent report by WHO on Essential Nutrition Actions are almost all related to low-income countries and to undernutrition, with only the one liners quoted in the Ministers' letter related to healthy food environments. Industry will find no directions from this WHO report, the directions need to come from the NZ Government.
- Nine of the industry recommendations have potential for harm and these should be actively discouraged by the NZ Government. Nutrition education is the role of government not the ultra-processed food companies.
- The Government notes four areas of priority (food marketing, reformulation and labelling, healthier retail environments, and monitoring and evaluation). The Government is to be congratulated on choosing these areas for action, although there are no substantive details other than short bullet points. These areas were among the top priorities identified by over 50 New Zealand experts in [2014](#) and over 70 experts in [2017](#) but are not yet enacted. If these areas can be enacted with regulations where possible and with strong government leadership and monitoring, then progress can be made.

Specific assessment of each industry recommendation

Note that recommendations with an asterisk (*) are the ones which the Government signalled were priorities for the industry to work on.

Reformulation and Innovation

***Recommendation 1:** Nutrition policies and guidelines should be public facing for food and beverage companies including food manufacturers, brand owners and fast food service interests with more than 10 outlets by 1 June 2019.

Agree if strengthened – A Government-led group which includes the food industry and NGOs should develop a nutrition policy template for ALL food companies (large and SME) with independent monitoring of the strength and comprehensiveness of the policies. Policies to include SMART commitments on marketing to children, labelling and reformulation. Otherwise the policies will continue to be as weak, vague and unevaluable as they were in 2017.

***Recommendation 2:** Industry associations work together to develop a nutrition policy template for SMEs, to use in the future, by June 2019 and informed by government/NGO positions.

Agree if strengthened – As for recommendation 1.

Recommendation 3: The Government to proceed immediately to initiate a Children's National Nutrition survey to update the 2002 survey. While consideration might be given to phasing and segmenting the survey to spread cost over time, immediacy of commencement is vital for reasons set out in the foregoing discussion.

Strongly agree but not an industry commitment – This is long overdue and is a failing of central government over multiple administrations.

Recommendation 4: The Government to schedule the conduct of an Adult National Nutrition Survey as soon as possible to update the 2008 survey for all the reasons set out in the foregoing discussion.

Strongly agree but not an industry commitment – This is also long overdue and is a failing of central government over multiple administrations.

***Recommendation 5:** The Government (lead), with the Heart Foundation and industry, agree, where possible and appropriate, to adopting the same voluntary nutrient reformulation targets identified by the Australian Healthy Food Partnership in categories that align with the New Zealand Heart Foundation Targets. Work on this should commence in early 2019 and targets agreed by mid-2019. Progress should be reported by December 2021. The measure would reflect the percentage of target product by sales volume active in the reformulation to meet the targets.

Agree if strengthened – The Government should lead a programme of structured reformulation for sodium and sugar that is based on the best practice from the Public Health England [model](#) and the Australian Healthy Food Partnership. In the recent Australian consultation on reformulation targets, the George Institute, a WHO Collaborating Centre for Salt Reduction, provided [detailed analyses](#) using their extensive food databases and found that many of the sodium targets were too conservative. Similar analyses are possible in New Zealand – see the [State of the Food Supply Report](#). The NGOs in that consultation made a strong call for independent monitoring of product reformulation and Public Health England undertakes major evaluations of sales-weighted data to assess progress towards its target of 20% reduction in sugar content by 2020. They have only managed a 3% reduction by 2018, most of which is due to the levy on sugary drinks (unpublished data). This highlights the point that while structured reformulation for reducing sodium in processed food will almost certainly help reduce high blood pressure and cardiovascular diseases, reformulation by itself cannot be relied upon to make much difference to obesity.

***Recommendation 6:** Where targets identified by the Australian Healthy Food Partnership are in categories that do not align, consideration be given as to whether, and how best, these might be adopted. This should be conducted in parallel with Recommendation 1, with the Government (lead), the Heart Foundation, industry and other expert groups reviewing the full completed list of Australian Healthy Food Partnership targets during 2019 to identify additional targets that could commence in New Zealand in 2020 and be reported on two years after commencement. The measure would reflect the percentage of target product by sales volume active in the reformulation to meet the targets.

Agree if strengthened – as for recommendation 5

Recommendation 7: To further accelerate the reduction of sugar New Zealanders consume from beverages the New Zealand Beverage Council finalises its all-new sugar reduction pledge (20% by 2025) and launches it in the first quarter of 2019.

Smoke and mirrors (Category 1, business-as-usual) – This is almost certainly business-as-usual given historical trends and will not be independently monitored.

***Recommendation 8:** Following the completion of each phase of the Children’s National Nutrition Survey, the Government, the Heart Foundation and industry to review the categories and associated targets to identify any adjustments appropriate for the New Zealand population.

Smoke and mirrors (Category 1, business-as-usual) – Naturally all parties, including many NGOs (other than the Heart Foundation) and academics, will review government and industry actions in light of the survey results.

Recommendation 9: The Government and industry to agree on the definitions of 'serve', 'serving', and 'portion', based on the Australian Healthy Food Partnership work in this area by March 2019. The measure is agreement by the Government and industry.

Smoke and mirrors (Category 2, distraction) – This is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity. It should be either dismissed or be a very low priority for government engagement.

Recommendation 10: The Government and industry establish principles to apply for determining serving size by mid-2019 in line with the Australian Healthy Food Partnership work (had been expected December 2018). The measure is agreement on principles by the Government and industry.

Smoke and mirrors (Category 2, distraction) – This is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity. It should be either dismissed or be a very low priority for government engagement.

Recommendation 11: Once principles for determining serving size are established, the Government and industry develop and identify implementation strategies to adopt an awareness campaign on portion guidance and serving size by December 2019. The measure is an action programme of strategies, and level of awareness achieved over current awareness.

Smoke and mirrors (Category 3, potential for harm) – This is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity. This industry-agenda campaign would take tax-payer funded health sector resources away from other public education campaigns (ie, an opportunity cost) and is likely to confuse the public.

Recommendation 12: The Government and industry develop and adopt voluntary principles and serving-size ranges (including for fast and snack foods) and establish a pledge programme for uptake by December 2019, subject to review after a three-year period of application. The measure is extent of pledges by industry.

Smoke and mirrors (Category 2, distraction) – Again, this is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity. It should be either dismissed or be a very low priority for government engagement.

Recommendation 13: Once principles for determining serving size are established, industry develops a best-practice guide for serving size and portion guidance in line with the Australian Healthy Food Partnership. This should provide guidance and support to food companies to incorporate nutrition as a key driver in labelling decisions regarding the size of servings and the size of food and drinks offered. This could be part of wider guidance from the Australian Healthy Food Partnership. Areas for guidance, relating to serving size and portion size, include:

- Adopting consistent terminology
- Off-pack labelling information
- Voluntary goals relating to serving size
- Promoting appropriate portion sizes
- Serving control devices in product presentation
- Advice about serving size in consumer communication material.

Smoke and mirrors (Category 2, distraction) – This is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity. It should be either dismissed or be a very low priority for government engagement.

Recommendation 14: The New Zealand Food & Grocery Council and the confectionery industry identify strategies to further promote uptake of the Be Treatwise® programme in New Zealand and raise awareness across consumers. The measure is an action programme of strategies, and level of awareness achieved over current awareness.

Smoke and mirrors (Category 3, potential for harm) – This is an industry agenda and appears nowhere in any authoritative reports on priority actions for reducing obesity.

Employee Health and Wellness Programmes

Recommendation 15: Industry to increase sharing and promoting health and wellness programme best practice by increasing the presence on their websites of steps they are taking and initiatives underway. Benchmark to be assessed from current websites of top 20 major manufacturers by category volume and reassessed in December 2020.

Smoke and mirrors (Category 2, distraction) – If the Government transformed obesogenic environments (by appropriate regulation and food taxes and investment in active transport infrastructure), then additional investment in health and wellness programmes at the employee level may not be cost-effective. This type of government approach is also more equitable – as it does not just benefit those in employment.

Recommendation 16: Industry and the Government to further promote company and government tools on health and wellness for smaller companies to draw on. The Government to assist this process by ‘pushing’ ideas and successful programmes out to food and beverage companies they contact. This could be measured by reach and frequency of communication. The measure to be a continuation and amplification of the Government’s programme supplemented by an assessment of industry communication.

Smoke and mirrors (Category 2, distraction) – see Recommendation 15. The Government does not even have such support for schools and early

childhood education centres which are a much higher priority. If there was to be a next priority, it would be piloting and evaluating improved programmes for the health and wellness of civil servants (and if these are successful to provide guidelines to other employers).

Recommendation 17: Industry and the Government to recognise and promote innovative programmes that address to factors contributing to obesity through direct and indirect communication channels. The measure to be reach and frequency of communication over two years to December 2020.

Smoke and mirrors (Category 2, distraction) – see Recommendation 15.

Recommendation 18: Industry associations to identify initiatives to increase uptake/penetration of offered health and wellness programmes within companies. The benchmark to be nominated by industry associations and reassessed by survey in 2020.

Smoke and mirrors (Category 2, distraction) – see Recommendation 15.

Recommendation 19: Industry associations to develop a 'Small but Beautiful' minimalist health and wellness programme for companies with 0-10 employees operating in the food and beverage industry in collaboration with the Health Promotion Agency and/or Ministries of Health and Primary Industries by December 2019. This programme to be rolled out to other industries if successful.

Smoke and mirrors (Category 2, distraction) – see Recommendation 15.

Community and Education Initiatives

Recommendation 20: Companies are encouraged to continue programmes, especially those that have been demonstrably successful at improving the health and wellbeing of the community.

Smoke and mirrors (Category 1, business-as-usual) – Community and education initiatives on food and aimed at children are not primarily the responsibility of the private food sector. The conflict of interest between company commercial interests and children's health is far too great for any processed food or fast-food company to be involved with children's nutrition and community nutrition. This is mainly the responsibility of the Government – which also pays for the consequences of poor nutrition via the public health system.

Recommendation 21: Companies to expand community programmes where feasible or develop ways to join with other companies, associations, communities and other Government initiatives to expand.

Smoke and mirrors (Category 3, potential for harm) - Community and education initiatives on food and aimed at children are not primarily the responsibility of the private food sector. The conflict of interest between company commercial interests and children's health is far too great for

any processed food or fast-food company to be involved with children's nutrition and community nutrition. This is mainly the responsibility of the Government – which also pays for the consequences of poor nutrition via the public health system.

Recommendation 22: Industry and the Government to promote (with associations) templates of community programmes (that set out description, resourcing, ideas for implementation and aspects to particularly consider) to increase uptake by more companies.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendation 23: The Ministries of Health and Education establish industry liaison positions as points of contact for the food and beverage industry to facilitate ongoing engagement on community and education initiatives.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendations 24: Ministries of Health and Education and industry develop Guiding Principles for developing school resources.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendation 25: The Government works with schools to encourage them to adopt a water-only policy that supports the pledge made by New Zealand Beverage Council members to only supply bottled water to primary and intermediate schools.

Smoke and mirrors (Category 1, business-as-usual) – This should not be about the Government supporting the Beverage Council, it should be about the Government doing its job (and without any linkage with the Beverage Council). This is a domain where the Government should simply direct all schools to have water-only policies.

Recommendation 26: Specific to the 'The Cooking Curriculum Project' developed by Vegetables NZ and The Heart Foundation:

- By 2020, 80 % of teachers of the cooking curriculum are using the resources and tools to teach year 7 and 8 students to cook a meal
- By 2021, 80% of students at the end of year 8 are able to cook a healthy meal.

Smoke and mirrors (Category 1, business-as-usual) – See recommendation 20

Recommendation 27: Companies are encouraged to prioritise/develop programmes or content relevant and accessible to 'at risk' populations such as in low decile school areas (if not already doing so, and as appropriate) in order to reach low socioeconomic communities.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendation 28: Companies encouraged to prioritise/develop culturally relevant programmes to Maori and Pacific as appropriate.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendation 29: Industry to develop strategies to increase the number of companies supporting NGOs in areas affecting obesity such as through partnering or social responsibility investment.

Smoke and mirrors (Category 3, potential for harm) – see recommendation 21

Recommendation 30: Associations to develop strategies to increase the number of companies educating consumers online through their company websites.

Agree if strengthened – All major food companies should have their policies on their websites but these need to be specified: Their nutrition policies; their commitments on reformulation, labelling and marketing to children; the nutrient content of their products; other relevant educational content for adults. Indeed, Government should consider regulations to require food companies to have such information on their websites.

Recommendation 31: Where initiatives are evaluated, companies form summaries which are made public in order to show the level of impact and as a means of encouraging others to undertake similar programmes.

Smoke and mirrors (Category 1, business-as-usual) – The dissemination of evaluations and summarising them is not the problem. The main problem is that the initiatives are not well evaluated in the first place. This should be the recommendation.

Food and Beverage Marketing

***Recommendation 32:** Amend the ASA Children and Young People’s Code to restrict fixed site outdoor advertising (digital, billboard, sandwich board etc) of high saturated fat, salt and added sugar products within 300 metres of the main gate of Primary and Intermediate schools by 30 June 2019.

Agree if strengthened – Marketing to children should be regulated by NZ law because the ASA Code is far too weak according to a [publication](#) from 70 New Zealand health professors. Baseline data in the [national food environments report](#) 2014-2017 and a peer-reviewed [publication](#) used 500m, not 300m, so 500m should be used as the starting point. Secondary schools should be included – no reason was given to exclude them. All companies should include this commitment in their food marketing policy which should be on their website.

***Recommendation 33:** Review with television broadcasters opportunities to expand the band of afternoon viewing restrictions for high saturated fat, salt and added sugar food and beverage outside school hours pre-6pm by June 2019.

Smoke and mirrors (Category 2, distraction) – Pre-6pm is not the peak viewing hours of children – it is 6-10pm. This is where the restrictions need to be. This is well documented in a peer-reviewed [publication](#). Marketing to children needs to be regulated by the NZ Government because self-regulation by industry does not protect children.

***Recommendation 34** The Association of NZ Advertisers and companies to identify and encourage adoption of best practice for controlling placement and targeting on digital/online/social media channels such as/use of 'age gate' mechanisms and use of white lists across the industry to limit inadvertent exposure to young audiences. ANZA to report on progress mid and end 2019.

Agree – All food companies who use any digital media for marketing need to have a detailed policy on how they minimise exposure to children under 18. The policy should be posted on their website, preferably mandated as part of regulations to restrict food marketing to children.

***Recommendation 35:** Industry to develop with convenience store representatives a policy for store branding on convenience stores within a defined distance from Primary and Intermediate schools by December 2019.

Agree if strengthened – Government needs to lead this policy development and the monitoring of change to store branding and effect on children's exposure. Secondary schools need to be included.

Recommendation 36: Industry to present an annual report to Ministers and other stakeholders on compliance with the ASA Code, both media placement and creative.

Smoke and mirrors (Category 2, distraction) – Government should be monitoring exposure of children to unhealthy food marketing. The record of complaints, which is available on the ASA website is not a measure of exposure of unhealthy food marketing to children.

Recommendation 37: The Association of NZ Advertisers to develop a 'certificate of compliance' recognising companies that complete accredited training and have in place mitigation policies to ensure compliance with the ASA Code by 30 June 2019. This might include training programmes completed by companies and their advertising agencies, use of external pre-vetting and mitigation and compliance steps taken in marketing.

Smoke and mirrors (Category 1, business-as-usual) – This should be standard practice for ANZA.

Recommendation 38: ASA (lead), industry and the Government to proceed with a review of the Food and Beverage Classification System in order to design a fit-for-purpose system within 12 months (2019) taking into account any impact from the outcomes of the HSR 5-year review.

Smoke and mirrors (Category 2, distraction) – This has already been done by WHO and it is not the role of ASA to define classifications of the healthiness of foods. Food marketing to children should be regulated by the Government – it is unethical for children not to be protected from commercial pressures that endanger their current and long-term health.

Recommendation 39: New advertisements that may have high attraction/appeal to children be subject to pre-vetting to ensure compliance, particularly where internal compliance assessment may not be available, by 30 June 2019.

Smoke and mirrors (Category 1, business-as-usual) – Marketing to children should be regulated. Government should lend legitimacy to flawed ASA Codes for marketing junk food.

Recommendation 40: Industry, the Ministry of Health and the Ministry of Education, to develop a policy on school sponsorship (sports, cultural, events) by December 2019.

Agree if strengthened – Sponsorship is currently a major loophole whereby unhealthy food and drinks can be directly marketed to children. However, it is the role of Government to define the policy as part of its regulations on marketing to protect the health and wellbeing of children. It is not the role of conflicted food companies which marketing unhealthy foods to develop sponsorship policy.

Recommendation 41: Encourage companies to publish advertising and marketing policies by 30 June 2019. The measure to be the number of companies with published advertising and marketing policies.

Agree if strengthened – The development of a SMART template for reporting these marketing policies (as with all policies under recommendation 1) should be Government-led and independently evaluated for strength and comprehensiveness.

Recommendation 42: The Association of NZ Advertisers to develop a template of responsible advertising and marketing policy for those companies, particularly SMEs, that do not have such a policy by 31 March 2019.

Smoke and mirrors (Category 2 distraction) – Large companies have their own capacity to develop policies and SMEs generally do not market to children. As with recommendation 41, this needs to be Government-led and independently monitored.

Recommendation 43: Companies with multiple checkout lanes to report on their undertakings to provide confectionery free checkout lanes by December 2019.

Agree if strengthened – There should be a substantial number (at least half) of check-out lanes that have no unhealthy foods – not just confectionery. Regulations on marketing children should include mandating this.

Recommendations for Labelling and Rollout of Health Star Rating System

***Recommendation 44:** Industry to identify actions, in conjunction with MPI, to encourage greater uptake of HSR. This should encompass measures to encourage application on all eligible products within a company's product range rather than selecting a limited range. This is intended to build further consumer familiarity and broaden application on supermarket shelves. The measure to be the increase in uptake annually.

Agree if strengthened – There has been a very low and selective voluntary uptake of HSR on ultra-processed foods and the Government has been negligent in its support of consumers by not making HSR mandatory. HSR looks set to remain a low quality front-of-pack system compared to international best practice. Government should set a target for uptake (such as >80% of products in the next two years) otherwise it should make it mandatory.

***Recommendation 45:** Industry to consider further actions necessary or applicable after the outcome of the HSR 5-year review is announced in the latter half of 2019.

Smoke and mirrors (Category 1, business-as-usual) – Standard practice and the announcement of very weak measures means very little will change from the current practice of implementing HSR at a snail's pace.

Recommendation 46: The Government to resource a further promotion and awareness campaign for HSR commencing as soon as possible to build on the campaign that concluded mid-2018.

Agree but not an industry commitment – This is a recommendation for Government, not a commitment from industry. It is a low priority for taxpayer-funded funding until the HSR is on the majority of foods. It would be far more effective to make HSR mandatory so that promotion can be more cost-effective.

***Recommendation 47:** MPI and industry to review the regulatory provisions for menu labelling in various Australian States and Territories with a view to voluntary application of the best elements in New Zealand. This review to be complete for implementation end 2019.

Agree if strengthened – This is needs to be MPI-led and regulated otherwise it is highly likely that nothing will happen.

***Recommendation 48:** Fast food outlets to agree a voluntary approach to provide customers with guidance on healthier eating options (both on menus and if asked) and nutrition information by December 2019. Evidence of this might include reference in frontline training.

Smoke and mirrors (Category 1, business-as-usual) – This is already happening in a few companies and a voluntary approach will not change this pattern.

Recommendation 49: Companies/associations to voluntarily add nutrition information to recipes they publish on-line. A baseline survey is necessary in order to assess progress in this over time.

Smoke and mirrors (Category 1, business-as-usual) – This is already happening but with many exceptions which a voluntary approach will not change.

***Recommendation 50:** Industry to take on the recommendations that might result from the developments of the Australia and New Zealand Ministerial Forum on Food Regulation *Labelling of Sugars on Packaged Foods and Drinks* review.

Smoke and mirrors (Category 1, business-as-usual) – Very little came from that meeting that will change business-as-usual. Labelling of sugars needs to be mandatory, so industry's role is simply to abide by the regulations. Voluntary labelling will be next to useless if history is any guide.

Other Comments

Recommendation 51: The Taskforce develop a checklist of the recommendations to be undertaken by industry for companies to self-check and report against annually for the Government.

Smoke and mirrors (Category 2, distraction) – Having companies set their own homework and then mark it is not an accountability system.