

## AUSTRALIAN CHRONIC DISEASE PREVENTION ALLIANCE



### Submission to consultation on Labelling of Sugars on Packaged Foods or Drinks (September 2018)

#### SECTION 1: General questions

**Question 1:** Do you support the statement of the problem in the consultation paper: *Information about sugars provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines.*

Yes

No

The Australian Chronic Disease Prevention Alliance (ACDPA) brings together Cancer Council Australia, the National Heart Foundation of Australia, Diabetes Australia, Stroke Foundation and Kidney Health Australia in the prevention of chronic disease through improving diet and physical activity, and reducing overweight/obesity.

ACDPA supports this statement of the problem and recommends that added sugars labelling be improved through mandatory changes to the ingredients list (Option 3) and quantifying added sugars in the Nutrition Information Panel (NIP) (Option 4).

In addition, we recommend changes to the existing interpretive front-of-pack Health Star Rating system by making it mandatory and incorporating added sugars into the algorithm and nutrient icon. We make these recommendations to provide consumers with consistent information and enable informed choices on sugars intake.

**Question 2:** Are you aware of any form of information about added sugars that is provided on food labels in addition to those identified in Section 1.6 of the Consultation RIS?

Yes

No

**Question 3:** Are you aware of other sources of information (publically available or otherwise) on the added sugars content of foods available in Australia and New Zealand, beside those described in Section 1.8 of the Consultation RIS?

Yes

No

**Question 4:** Do you agree with the proposed desired outcome of this work? (*Food labels provide adequate contextual information about sugars to enable consumers to make informed choices in support of the dietary guidelines*). If not, please suggest an alternate desired outcome and justify your suggestion.

Yes

No

ACDPA supports the proposed desire of this work – to provide adequate contextual information about added sugars to enable consumers to make informed choices.

In 2011-12, more than half of Australians usually exceeded the World Health Organization recommendation to limit added sugars intake to 10%. This recommendation is based on increasing evidence that high intake of added sugars is associated with weight gain due to excess energy intake, and dental caries. There was wide variation in the amounts of added sugars consumed in Australia, with older children and teenagers most likely to exceed the recommendation. On average, Australians consumed around 60 grams of added sugars each day (around 14 teaspoons).

Improved labelling of added sugars in the NIP and ingredients list is necessary to enable consumers to make informed choices regarding their intake of added sugars.

References:

WHO 2015. Guideline: Sugars intake for adults and children.

ABS 2016. Australian Health Survey: Consumption of Added Sugars. Australia. 2011-12. 364.0.55.011.

## **Option 2: Education on how to read and interpret labelling information about sugars**

**Question 5:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to justify your views.

Effective

Not effective

Partially effective

No opinion

Effective in combination with another option

ACDPA does not consider this to be an effective option.

This policy option relates to education on current labelling; however, as identified in the consultation paper, the current labelling of added sugars is inadequate for consumers to make informed decisions. In addition, there are more than 40 different names for added sugars, which would be a challenge for education.

References:

CHOICE. <https://www.choice.com.au/food-and-drink/nutrition/sugar/articles/added-sugar#42%20sugar%20names>

**Question 6:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

A lot

Somewhat

Not at all

Education on the current label will not benefit consumers, as the existing labels provide inadequate information on added sugars. This option is likely to be ineffective, therefore education on existing labels would not be an efficient use of resources.

This option would impact ACDPA and other public health groups, based on the current overconsumption of added sugars and their contribution to overweight/obesity. Public health groups would need to continue dedicating resources to educate the community about recommendations to limit added sugars in relation to the Australian Dietary Guidelines and World Health Organization recommendations, and in the context of unhealthy weight gain as a risk factor for chronic disease.

### Option 3: Change to statement of ingredients

**Question 7:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to support your view.

- Effective
- Not effective
- Partially effective
- No opinion
- Effective in combination with another option

ACDPA recommends that changes to the ingredients list would be effective in combination with changes to the NIP.

This policy option reflects Recommendation 12 in the Review of Food Labelling Law and Policy 2011 (Labelling Logic Review) regarding the labelling of added sugars, fats and oils:

*“Recommendation 12: That where sugars, fats or vegetable oils are added as separate ingredients in a food, the terms ‘added sugars’ and ‘added fats’ and/or ‘added vegetable oils’ be used in the ingredient list as the generic term, followed by a bracketed list (e.g., added sugars (fructose, glucose syrup, honey), added fats (palm oil, milk fat) or added vegetable oils (sunflower oil, palm oil)).”*

The Labelling Logic Review noted that individual listing of like ingredients (e.g. different types of added sugars) appears to cause consumer confusion and can reduce the opportunity for consumers to easily and quickly understand the contribution of added sugars in products. As identified earlier, there are over 40 different names for sugars used in ingredients lists.

For example, the ingredients list for Kellogg’s Just Right includes different types of added sugars, which are dispersed throughout the ingredients list: Whole grains (62%)(wheat, oats), fruit (20%)(sultanas, apricot piece [**concentrated apricot puree, concentrated apple puree, invert syrup**, humectant (glycerol), **sugar**, wheat fibre, gelling agent (pectin), acidity regulator (malic acid), natural flavour, colours (paprika, lutein)], **sugar**, puffed triticale, wheat flour, barley malt extract, natural flavour, salt, **honey**, mineral (iron), vitamins (niacin, riboflavin, folate, thiamin).

Grouping added sugars together, as recommended in the Labelling Logic Review, would benefit consumers through shifting 'added sugars' higher in the ingredients list, and enabling better recognition of the actual contribution of added sugars in products. There is strong public support for grouping added sugars in the ingredients list. A 2017 nationally representative CHOICE survey reported that 68% of Australians supported grouping added sugars in the ingredients list.

ACDPA supports this option in combination with changes to the NIP to enable consumers to see the total contribution of added sugars to products.

References:

Blewett 2011. Labelling Logic – the final report of the Review of Food Labelling Law and Policy.

CHOICE 2017. End the sugar-coating. A report into added sugar labelling in Australia.

Kellogg's. [https://www.kelloggs.com.au/en\\_AU/products/just-right-original.html](https://www.kelloggs.com.au/en_AU/products/just-right-original.html)

**Question 8:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

A lot

Somewhat

Not at all

ACDPA brings together the Heart Foundation, Cancer Council Australia, Diabetes Australia, Stroke Foundation and Kidney Health Australia. ACDPA advocates for improvements to food labelling to enable informed choices by consumers and ultimately reduce the impact of unhealthy diets on overweight/obesity and the development of chronic disease.

Consumers would receive significant benefit from improved labelling of added sugars on the ingredients list and NIP. Implementing this option, in conjunction with Option 4, would reduce consumer confusion and enable consumers to more easily identify the contribution of added sugars to products.

**Question 9:** Referring to Table 1 in Section 3.1, which implementation mechanism would be most appropriate for this policy option? Please provide the pros and cons of your selected implementation mechanism.

Voluntary implementation

Code of practice - Industry driven

Code of practice - Government driven

Regulatory

Please provide the pros and cons of your selected implementation mechanism, using evidence to justify your view.

ACDPA supports a regulatory approach to changes to the ingredients list. Regulation is the best way to ensure consistent and compliant delivery of information to consumers across all products. Updating existing regulation of the statement of ingredients through Standard 1.2.4 of the Food Standards Code offers the most appropriate implementation mechanism for this option.

Industry self-regulation is not appropriate. Evidence from the food and beverage industry demonstrates that voluntary industry self-regulation is not effective.

For example, two Australian self-regulatory industry initiatives aimed at reducing unhealthy food marketing to children have consistently been found to be ineffective. There are also significant limitations (including loopholes), lack of monitoring for compliance and no meaningful sanctions for breaches (Reeve 2016). A 2011 Australian Communications and Media Authority monitoring report concluded that there was insufficient evidence that self-regulatory industry codes had any effect on food marketing to children (ACMA 2011). A 2017 article reported that, while many of the largest food and beverage companies are signatories to the voluntary codes, self-regulation has failed to reduce children's exposure to unhealthy food marketing by both signatories and non-signatories to the codes (Watson 2017).

References:

Reeve, B., Self-Regulation of Food Advertising to Children: An Effective Tool for Improving the Food Marketing Environment? *Monash University Law Review*, 2016. 42(2): p. 419-457.

ACMA 2011, Industry self-regulation of food and beverage advertising to children. ACMA monitoring report.

Watson, W.L., et al., Advertising to children initiatives have not reduced unhealthy food advertising on Australian television. *J Public Health (Oxf)*, 2017: p. 1-6.

#### **Option 4: Added sugars quantified in the nutrition information panel (NIP)**

**Question 10:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to justify your views.

Effective

Not effective

Partially effective

No opinion

Effective in combination with another option

ACDPA recommends that quantifying added sugars in the NIP would be effective and recommends the introduction of this option, in combination with changes to the ingredients list.

The NIP is one of the most important communication tools, providing information about the nutritional composition of products in a standardised manner that enables comparison between products (i.e. per 100g/per100mL). FSANZ research suggests that the NIP is consistently the most commonly used information for choosing one product over another, with sugars the most commonly checked information in the NIP.

While the WHO guideline recommends that adults and children limit their daily intake of added sugars, this is difficult for consumers, as the NIP records total sugar but does not quantify added sugars in products. Quantification of added sugars in the NIP would enable consumers to identify products with larger amounts of added sugars and make effective comparisons across products to support

healthier choices. This option is supported by consumers. A 2017 nationally representative CHOICE survey reported that 72% of consumers supported listing added sugars in the NIP.

The US Food & Drug Administration has announced changes to the NIP to include quantification of added sugars based on the scientific evidence supporting reducing caloric intake from added sugars. Implementation of this option in the US demonstrates its practical feasibility and offers useful insight into appropriate definitions and monitoring and compliance strategies.

Disclosure of added sugars information on the NIP also provides an incentive for manufacturers to reformulate to reduce added sugars. Some products are already including added sugars on the NIP, to demonstrate that no or very little sugar has been added by the manufacturer. For example, Farmers Union Greek Style Natural Yoghurt lists total sugars as 5.2/100g and added sugars as 0/100g on the NIP.

Including the amount of added sugars on the NIP would make it easier for consumers to identify healthier options, consistent with the WHO guidelines and Australian Dietary Guidelines. This option would complement changes to the ingredients list by enabling consumers to see the amount of added sugars included by the manufacturer, as well as the types of sugars added.

References:

FSANZ 2017. Consumer label survey 2015.

WHO 2015. Guideline: Sugars intake for adults and children.

US Food & Drug Administration.

<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm385663.htm>

Farmers Union. <http://www.farmersunionyogurt.com.au/products/>

CHOICE 2017. End the sugar-coating. A report into added sugar labelling in Australia.

**Question 11:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

A lot

Somewhat

Not at all

ACDPA advocates for improvements to food labelling to enable informed choices by consumers and ultimately reduce the impact of unhealthy diets on overweight/obesity and the development of chronic disease.

Consumers would receive significant benefit from improved labelling of added sugars on the ingredients list and NIP. Implementing this option, in conjunction with Option 3, would reduce consumer confusion and enable consumers to more easily identify the contribution of added sugars to products.

**Question 12:** How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? Would adopting this option require another element of a food label to be removed from the package? If so, which labelling elements would be removed?

This option would require one additional line in the current mandatory NIP, as regulated by the Food Standards Code. This is a minimal change, unlikely to negatively impact other existing elements of the food label and it is consistent with how fats are now displayed on the NIP.

**Question 13:** Referring to Table 1 in Section 3.1, which implementation mechanism would be most appropriate for this policy option? Please provide the pros and cons of your selected implementation mechanism.

- Voluntary implementation
- Code of practice - Industry driven
- Code of practice - Government driven
- Regulatory

Please provide the pros and cons of your selected implementation mechanism, using evidence to justify your view.

Updating of existing regulatory requirements for the NIP through the Food Standards Code offers the most appropriate implementation mechanism for this option to ensure consistent and compliant delivery of information across all products.

As identified earlier, industry self-regulation is not effective (for example in the marketing of unhealthy products to children). The voluntary implementation of the Health Star Rating system provides another example, with variable and inconsistent uptake across product ranges and by manufacturers. At the 2-year progress review, only 14% of products in the nominated database of eligible foods were displaying the ratings. Some manufacturers were applying ratings to the highest-scoring products only. A mandatory approach would remove these inconsistencies and enable consumers to make meaningful product comparisons.

Regulating added sugars on the NIP recognises this is the best way to ensure consistent and compliant delivery of this information to consumers across the food supply. Industry self-regulation and voluntary implementation have been shown to be ineffective.

References:

HSRAC 2017. Two year progress review report on the implementation of the Health Star Rating system – June 2014 – June 2016.

### **Option 5: Advisory labels for foods high in added sugars**

**Question 14:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to justify your views.

- Effective
- Not effective
- Partially effective
- No opinion
- Effective in combination with another option

A warning style label is likely to have some benefits for consumers, in combination with changes to the NIP and ingredients list.

As a priority, ACDPA recommends enhancing the existing interpretive front-of-pack Health Star Rating (HSR) labelling system to provide consistent information for consumers by:

- Incorporating added sugars in place of total sugars in the algorithm and on the nutrient icon
- Making it mandatory across all products to enable quick and easy product comparisons
- Increasing the use of the interpretive terms 'high' and 'low' on nutrient icons to enhance consumer understanding of the nutritional content of products.

Currently, the algorithm does not discriminate between naturally occurring sugars in dairy, fruits and vegetables, and sugars added in the manufacturing process. Similarly, total sugars are included in the Health Star Rating nutrient icon, rather than added sugars. Research from The George Institute found that including added sugars in the algorithm improved the system's performance and discrimination between core and discretionary foods. The researchers concluded that the data "argue for inclusion of added sugar in an updated HSR algorithm and declaration of added sugar as part of mandatory nutrient declarations."

As an adjunct to improving the HSR system, warning/advisory labels could be considered for certain products that contribute the largest proportion of added sugars, in combination with changes to the NIP and ingredients list.

References:

Peters, A. et al. 2017. Incorporating Added Sugar Improves the Performance of the Health Star Rating Front-of-Pack Labelling System in Australia. *Nutrients*.9:701.

**Question 15:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

A lot

Somewhat

Not at all

ACDPA advocates for improvements to food labelling to enable informed choices by consumers and ultimately reduce the impact of unhealthy diets on overweight/obesity and the development of chronic disease.

As a priority, enhancements to the existing Health Star Rating system would build on the existing efforts of stakeholders to improve and promote the system, and the growing consumer recognition and use of the system.

Consumers may receive some additional benefit from advisory labels for certain products that contribute the largest proportion of added sugars to the Australian diet.

**Question 16:** How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? Would adopting this option require another element of a food label to be removed from the package? If so, which labelling elements would be removed?



Adoption of this option has potential to impact on voluntary front-of-pack labelling, such as the Health Star Rating system. The Health Star Rating system currently has low uptake on sugary drinks and/or confectionary, with products generally displaying the permitted 'energy icon only' instead of the Health Star logo.

We support making the Health Star Rating system mandatory to enable meaningful comparisons between products. Warning/advisory labels could have some additional benefits for certain products that contribute the largest proportion of added sugars.

**Question 17:** Referring to Table 1 in Section 3.1, which implementation mechanism would be most appropriate for this policy option? Please provide the pros and cons of your selected implementation mechanism.

**No response**

- Voluntary implementation
- Code of practice - Industry driven
- Code of practice - Government driven
- Regulatory

### **Option 6: Pictorial approaches to convey the amount or types of sugars in a serving of food.**

**Question 18:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to justify your views.

- Effective
- Not effective
- Partially effective
- No opinion
- Effective in combination with another option

Pictorial approaches on labels are likely to have some benefits for consumers, in combination with changes to the NIP and ingredients list.

As a priority, ACDPA recommends enhancing the existing interpretive front-of-pack Health Star Rating (HSR) labelling system to provide consistent information for consumers by:

- Incorporating added sugars in place of total sugars in the algorithm and on the nutrient icon
- Making it mandatory across all products to enable quick and easy product comparisons
- Increasing the use of the interpretive terms 'high' and 'low' on nutrient icons to enhance consumer understanding of the nutritional content of products.

Further detail on the HSR recommendations are included in question 14.

As an adjunct to improving the HSR system, pictorial approaches on labels could be considered for certain products that contribute the largest proportion of added sugars, in combination with changes to the NIP and ingredients list.

References:

Peters, A. et al. 2017. Incorporating Added Sugar Improves the Performance of the Health Star Rating Front-of-Pack Labelling System in Australia. *Nutrients*.9:701.

**Question 19:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

- A lot
- Somewhat
- Not at all

ACDPA advocates for improvements to food labelling to enable informed choices by consumers and ultimately reduce the impact of unhealthy diets on overweight/obesity and the development of chronic disease.

As a priority, enhancements to the existing Health Star Rating system would build on the existing efforts of stakeholders to improve and promote the system, and the growing consumer recognition and use of the system.

Consumers may receive some additional benefit from pictorial approaches for certain products that contribute the largest proportion of added sugars.

**Question 20:** How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? Would adopting this option require another element of a food label to be removed from the package? If so, which labelling elements would be removed?

Adoption of this option has potential to impact on voluntary front-of-pack labelling, such as the Health Star Rating system. The Health Star Rating system currently has low uptake on sugary drinks and/or confectionary, with products generally displaying the permitted 'energy icon only' instead of the Health Star logo.

We support making the Health Star Rating system mandatory to enable meaningful comparisons between products. Warning/advisory labels could have some additional benefits for certain products that contribute the largest proportion of added sugars.

**Question 21:** Referring to Table 1 in Section 3.1, which implementation mechanism would be most appropriate for this policy option? Please provide the pros and cons of your selected implementation mechanism. (*Required*)

- Voluntary implementation
- Code of practice - Industry driven
- Code of practice - Government driven
- Regulatory

### **Option 7: Digital linking to off label web-based information about added sugars content**

**Question 22:** How effective would this option be in addressing the policy issue and achieving the desired outcome? Please provide evidence to justify your views.

- Effective
- Not effective

- Partially effective
- No opinion
- Effective in combination with another option

ACDPA does not consider this to be an effective option.

This policy option relates to further information on current labelling; however, as identified in the consultation paper, the current labelling of added sugars is inadequate for consumers to make informed decisions. This policy option is unlikely to be effective, particularly by those with less motivation to improve diets.

There are further contributing factors to this option being ineffective – including limited wi-fi/internet access when shopping and time constraints. Information at the point-of-sale is the most effective in providing information to consumers.

Better labelling of added sugars in the ingredients list and NIP is required to provide consumers with clear information about the added sugars in packaged foods and drinks, and enable informed choices consistent with the Australian Dietary Guidelines.

**Question 23:** How would this option impact you? Please provide impacts and cost relevant to you (*required*)

- A lot
- Somewhat
- Not at all

Digital linking to off-label web-based information will not sufficiently benefit consumers, as it does not provide information at the point-of-sale. This option is likely to be ineffective, therefore would not be an efficient use of resources.

This option would impact ACDPA and other public health groups, based on the current overconsumption of added sugars and their contribution to overweight/obesity. Public health groups would need to continue dedicating resources to educate the community about recommendations to limit added sugars in relation to the Australian Dietary Guidelines and World Health Organization recommendations, and in the context of unhealthy weight gain as a risk factor for chronic disease.

**Question 24:** How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? Would adopting this option require another element of a food label to be removed from the package? If so, which labelling elements would be removed?

No response

**Question 25:** Referring to Table 1 in Section 3.1, which implementation mechanism would be most appropriate for this policy option? Please provide the pros and cons of your selected implementation mechanism. (*required*)

- Voluntary implementation
- Code of practice - Industry driven

Code of practice - Government driven

Regulatory

Please provide the pros and cons of your selected implementation mechanism, using evidence to justify your view.

No response

### Questions about all proposed options

**Question 26:** Are there additional options that should be considered to address the policy issue and achieve the desired outcome? If so, please describe your suggested option and how it addresses the policy issue and would achieve the desired outcome? Please also describe the cost of implementing your proposed option.

Yes

No

Is the description of the strengths and weaknesses of the proposed options (compared to the status quo) accurate? Please justify your response with evidence.

No response

**Questions 27-28 have been included elsewhere in the consultation.**

**Question 29:** If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo. If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo. Please provide evidence to justify your response.

No response

**Question 30:** Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories? If so, which option(s) should apply to particular foods or food categories and what would these foods or food categories be?

	All packaged foods	Particular foods or food categories
Option 3 - Change to statement of ingredients	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Option 4 - Added sugars quantified in NIP	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Option 5 - Advisory labels for foods high in added sugars	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Option 6 - Pictorial approaches to convey the amount or types of sugars in a serving of food.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have selected particular foods or food categories in the question above, please specify which foods or food categories where the option should apply. Please provide evidence to justify your response.

ACDPA recommends mandatory changes to the statement of ingredients and mandatory inclusion of added sugars in the NIP for all packaged foods and drinks to enable consumers to make informed choices.

As a priority, ACDPA supports expanding the existing interpretive front-of-pack Health Star Rating labelling system by making it mandatory and incorporating added sugars into the algorithm and nutrient icon.

As an adjunct to these recommendations, warning/advisory labels and pictorial approaches could be considered for foods and drinks that contribute the largest proportion of added sugars (identified by the ABS data), in combination with changes to the NIP and ingredients list.

References:

ABS 2016. Australian Health Survey: Consumption of Added Sugars. Australia. 2011-12. 364.0.55.011.

**Question 31:** Is the description of the pros and cons of the different implementation mechanisms in Table 1 accurate? Please justify your response with evidence.

ACDPA broadly agrees with Table 1.

We recognise the limitations of voluntary and self-regulatory approaches and have provided examples in this submission.

- Industry self-regulation on the marketing of unhealthy foods to children has been found to be ineffective and have significant limitations (including loopholes), lack of monitoring for compliance and no meaningful sanctions for breaches (further detail in question 9)
- Voluntary uptake of the Health Star Rating system has resulted in inconsistent uptake by manufacturers and across products, with ratings often applied to higher-scoring products (further detail in question 13).

Regulatory approaches for both these examples could enhance outcomes and provide consistency for consumers. ACDPA supports mandatory approaches to the labelling of added sugars to provide consumers with consistent and reliable information to enhance decision-making.

**Question 32:** Are there other pros and cons associated with the different implementation mechanisms? Please describe what these are.

No response

**Question 33:** Are there any other benefits or costs associated with the proposed labelling options which have not been identified above?

ACDPA recognises the existing overconsumption of added sugars and the contribution of excess kilojoules to overweight/obesity and increasing risk of chronic disease.

The provision of information on added sugars on food and drink packaging enables consumers to make healthier choices, consistent with dietary guidelines, and encourages manufacturers to reformulate products to contain fewer added sugars. Reformulation has the potential to deliver small but meaningful reductions in added sugars across the food supply with potential benefits to population health without requiring behaviour change.

**Question 34:** Should there be exemptions or other accommodations (such as longer transition periods) made for small businesses, to minimise the regulatory burden? If so, what exemptions or other accommodations do you suggest?

No response

**Question 35:** What would be the cost per year for the industry to self-regulate (e.g. voluntary code of practice- industry driven)? Please justify your response with hours of time, and number of staff required. Please specify which country (Australia or New Zealand) your evidence is based on.

No response

**Question 36:** Would industry pass any of the costs associated with implementing the proposed options on to consumers? What is the basis for your view?

No response