

# FRSC Consultation: Policy guideline on information requirements for packaged food sold online

Australian Beverages Council Limited

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**The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry.**

For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and flavoured plant milks.

## **Summary**

The ABCL appreciates the opportunity to comment on the Food Regulation Standing Committee's Consultation on a policy guideline for information requirements for prepackaged food sold online

The ABCL supports the development of a clear, practical policy guideline that outlines Food Ministers' expectations regarding the information consumers should be able to access when purchasing pre-packaged food and beverages online. As online purchasing continues to grow across a wide range of platforms, ensuring that key information is available at the point of purchase is essential for safe and informed consumer choice.

The ABCL's detailed comments are provided in the responses to the consultation questions below.

**SUBMISSION:** Food Regulation Standing Committee Consultation: Policy guideline on information requirements for prepackaged food sold online

**Q10. Are you aware of any other relevant background information that should be considered? Please provide relevant links and references in your response.**

N/A

**Q11. Do you agree with the problem as stated?**

Yes.

Consumers are increasingly purchasing food and beverages online across a range of platforms. Access to key information, such as the ingredients list, allergen declarations, warning and advisory statements, and nutritional information, at the point of online purchase supports safe and informed consumer decision-making. A policy guideline that clarifies expectations around the availability of this information in online environments will help promote consistency and improve consumer access to necessary information.

**Q12. Do you agree with the desired outcome?**

Yes.

The ABCL agrees with the desired outcome if it provides clarity on the information expected to be displayed for prepackaged food and beverages sold online.

We note that some mandatory food labelling information (e.g. Country of Origin Labelling) falls outside the Food Standards Code and is not regulated by FSANZ, but may still play an influential role in informed consumer decision-making. It would be helpful for the policy guideline to clarify how non-FSANZ requirements would be managed in the context of a potential policy guideline.

**Q13. Do you support developing a policy guideline for information requirements for prepackaged food sold online?**

Yes.

**Q14. Are you aware of any unintended consequences for developing a policy guideline for information requirements for prepackaged food sold online?**

**SUBMISSION:** Food Regulation Standing Committee Consultation: Policy guideline on information requirements for prepackaged food sold online

Developing a policy guideline may create unintended impacts if the practical constraints of different online retail channels are not fully considered. Platforms vary widely in capability, from major grocery retailers with sophisticated systems to small sellers and marketplace stores with limited flexibility to display detailed information.

If these differences are not accounted for, the guideline could impose disproportionate costs or administrative burdens on smaller businesses or result in inconsistent implementation across platforms.

Targeted consultation with food retailers, suppliers, and digital service providers would help ensure the guideline is implementable and proportionate, and avoids creating obligations that are not technically feasible across all online sales channels.

**Q15. Do you agree with the proposed aim for the policy guideline on information requirements for prepackaged food sold online?**

Yes.

The ABCL agrees with the proposed aim that consumers should have access to the “necessary information” to make safe and informed purchasing decisions. Not all mandatory labelling elements are equally relevant in an online environment. Prioritising the key information that supports safe and informed purchasing is appropriate and helps avoid unnecessary complexity and compliance burden for retailers and industry, while still providing meaningful benefit to consumers.

**Q16. Do you agree with the proposed context for the policy guideline on information requirements for prepackaged food sold online?**

Yes.

The ABCL agrees that the context accurately reflects current market dynamics, including the increasing prevalence of online food purchasing.

**Q17. Do you agree with the proposed scope for the policy guideline on information requirements for prepackaged food sold online?**

Yes.

The ABCL agrees with the proposed scope, namely “all foods for retail sale that are required to bear a label according to the Food Standards Code.”

**SUBMISSION:** Food Regulation Standing Committee Consultation: Policy guideline on information requirements for prepackaged food sold online

However, the specific examples listed, i.e. “foods, beverages, alcoholic beverages and special purpose foods” as it is written in the draft policy guideline, may unintentionally imply that this list is exhaustive. To avoid ambiguity, it would be preferable to refrain from listing specific categories of food.

**Q18. Do you agree with the proposed overarching policy principles for the policy guideline on information requirements for prepackaged food sold online?**

Yes.

**Q19. Should specific reference be made to providing the Health Star Rating information when present on the food label?**

N/A

As Food Ministers are still considering whether to mandate the Health Star Rating system and no decision has been finalised, the ABCL considers it appropriate to defer any specific reference to the HSR within the policy guideline at this stage. The extent and nature of any potential changes to the system, should it transition from voluntary to mandatory, remain uncertain. To support clarity and long-term applicability of the guideline, any specific reference to the HSR should only be included once its future status has been formally determined.

**Q20. Do you agree with the other proposed specific policy principles?**

Yes.

The ABCL supports the proposed principles, including requiring food offered for sale online to be accompanied by a statement advising consumers to check the physical food label before consumption. Online images or descriptions may not always match the product delivered, particularly during packaging or formulation changeovers. Consumers should always refer to the physical label before consumption, especially in relation to allergies, medical conditions, or other health concerns.

Flexibility within the policy remains essential to reflect current operating conditions. The ABCL also emphasises the importance of clear responsibilities and accountabilities to ensure that product information presented online matches the details provided by the brand owner. This includes maintaining consistency with approved labelling content and promptly updating online listings when formulations, regulatory requirements, or packaging change. This will help minimise discrepancies between online information and physical products, supporting consumer trust and informed purchasing.

**Q21. Do you have any other feedback on the proposed policy guideline?**

As noted earlier, not all information required to appear on a label that may be important for informed consumer decision-making is regulated through the Food Standards Code. The policy guideline should clarify the expectations for information requirements outside of the Food Standards Code.

**Q22. Please provide any other comments or points for consideration that may not have been addressed in this consultation.**

Imported foods may present additional challenges. Many imported products are over-stickered for compliance without updating the underlying label artwork, and online listings often contain minimal ingredient or nutritional information beyond a single product image. Consideration should be given to how imported products will be managed within the policy framework.

**Further enquiries**

Should you have any queries regarding the positions detailed in this submission, please contact: Paula Treacey, Nutrition & Regulatory Officer, via email [paula@ausbev.org](mailto:paula@ausbev.org).