

THE CITY OF  
GREATER GEELONG

**SUBMISSION  
TO POLICY  
GUIDELINE ON  
INFORMATION  
REQUIREMENTS  
FOR  
PREPACKAGED  
FOOD SOLD  
ONLINE**

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DECEMBER 2025

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# Executive Summary

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**The City of Greater Geelong strongly supports the Food Regulation Standing Committee's recognition of the current challenges and the desired outcomes surrounding information requirements for prepackaged food sold online.**

We acknowledge the urgent need for policy action and welcome the opportunity to provide feedback on the proposed guidelines.

We believe it is important to establish clear and uniform expectations for all stakeholders, including retailers, manufacturers, regulators, and consumers, regarding the information that must appear when prepackaged food is sold online. Presently, there is inconsistency in online labelling, with only about half of all products displaying the required information and key details like allergen declarations and nutrition panels often missing. By ensuring consistency, we can guarantee that all consumers have equitable access to vital food safety and nutrition information, regardless of their shopping method.

With online food purchasing now mainstream, the absence of defined information requirements presents a growing risk to consumer protection. We recognise that consumers increasingly rely on digital information to make safe and informed choices. Policy intervention is essential to ensure that online shoppers enjoy the same protections as those shopping in physical stores.

We see the proposed policy guideline as supporting the strategic outcomes of the trans-Tasman Food Regulation System, empowering informed consumers and fostering thriving food economies. This guideline represents a proactive step to address current gaps, improve consistency, and safeguard consumers.

At this point, we are not aware of any further relevant background information to contribute. Nevertheless, we wish to reinforce our support for the policy development process and highlight that a clear framework will benefit both industry and regulators, enhance consumer decision-making, and ensure alignment with international standards.

We recognise that while the proposed policy guideline addresses the critical need for consistency and transparency in online food labelling, several additional considerations remain important.

We believe that ongoing engagement with stakeholders will be vital to ensure the framework remains relevant and adaptable to technological advances and emerging market

trends. Further, we highlight the importance of monitoring implementation to identify and address any unintended consequences, such as barriers for small businesses or accessibility challenges for diverse consumer groups.

By remaining attentive to these broader issues, policymakers can ensure the guideline achieves its intended goals and continues to protect and empower all consumers in a rapidly evolving digital marketplace.

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# Submission

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**The City of Greater Geelong (the City) welcomes the opportunity to contribute to the Food Regulation Standing Committee’s Consultation on the Policy Guideline for Information Requirements for Prepackaged Food Sold Online. After reviewing the Consultation Paper, we support both the identification of the problem and the desired outcome as outlined.**

We recognise the importance of establishing clear, consistent information standards for online sales of prepackaged food, and, while we are not aware of any additional relevant background information at this stage, we are pleased to offer our support and feedback as part of this important policy development process.

The City supports developing a policy guideline on information requirements for prepackaged food sold online.

## POLICY GUIDELINES

Policy guidelines establish a clear and uniform expectation for all stakeholders—retailers, manufacturers, regulators, and consumers—regarding what information must be provided when prepackaged food is sold online. This helps address the current inconsistencies identified in the consultation document, where studies found that only around 50% of products displayed mandatory labelling information online, and critical information such as allergen declarations and nutrition panels were often missing.

Consistent information provision ensures that consumers, regardless of where or how they shop, have equitable access to essential food safety and nutrition details.

As noted in the consultation paper online food purchasing is becoming mainstream, the absence of clear, consistent information requirements poses a growing risk to consumer protection as consumers increasingly rely on digital information to make safe and informed choices. A policy guideline ensures that online shoppers are not disadvantaged compared to those shopping in physical stores.

This approach also supports strategic outcomes for the trans-Tasman Food Regulation System: informed, empowered consumers and thriving food economies.

In summary, developing a policy guideline is a proactive step to address gaps in current practice, promote consistency, and protect consumers. It provides a clear

framework for industry and regulators, supports informed decision-making, and aligns with international standards.

## UNINTENDED CONSEQUENCES

While developing a policy guideline for information requirements for prepackaged food sold online is likely to deliver significant benefits, there are potential unintended consequences to consider.

The consultation document highlights that smaller retailers are less consistent in providing mandatory information online compared to major retailers, suggesting that new requirements could disproportionately impact small businesses.

Refer: *Maganja D, 2023 study: [Current food labelling practices in online supermarkets in Australia \(PDF\)](#)*

Small retailers and niche online businesses may face increased compliance costs and technical challenges in updating their systems to meet new requirements, which could limit their ability to compete or reduce product offerings online.

Overly detailed guidelines could also result in information overload for consumers, making it harder to identify key safety or nutrition details.

Refer: *FSANZ Labelling Requirements and Consumer Information [FSANZ Labelling Requirements](#)*

The diversity of online platforms means that consistent implementation may be difficult, potentially leading to gaps or uneven application. As noted in the consultation paper, if the guideline is not well supported or enforced, some sellers may ignore or circumvent requirements, undermining consumer trust.

There is also a risk that consumers may develop a false sense of security, assuming all online information is accurate and complete, as the consultation document and research highlight, not all sellers consistently provide mandatory information, and there may be gaps, outdated details, or non-compliance—especially among smaller retailers or on third-party platforms. If consumers trust that online information is always correct, they may overlook the need to check physical labels upon delivery or fail to notice missing or incorrect details, which could lead to safety risks (such as undisclosed allergens or inaccurate nutrition information). This risk is compounded if enforcement is limited or if the guideline is not uniformly adopted, making consumer vigilance still necessary despite the presence of guidelines.

Finally, if the guideline diverges from international standards, it could create barriers for imported products or complicate cross-border e-commerce. These risks highlight the importance of clear, practical guidance, support for small businesses, alignment with international standards, and ongoing monitoring of impacts.

## SCOPE OF THE GUIDELINES

The City supports the proposed aim, context, scope, and overarching policy principles for the policy guideline concerning information requirements for prepackaged food sold online. We agree that establishing such a guideline is essential for promoting consistency, protecting consumers, and aligning with international standards.

In response to the proposed scope, the City recommends that food wholesalers be included within the businesses required to implement online labelling. This inclusion would ensure that food service businesses can access accurate and comprehensive product information, thereby supporting informed decision-making across the supply chain.

Overall, the City endorses the direction and intent of the policy guideline, recognising its potential to address current gaps and improve consumer safety and confidence in the online retail environment.

## HEALTH STAR RATING

The City strongly supports making specific reference to the inclusion of Health Star Rating (HSR) information online whenever it appears on the physical food label.

Having ingredient listings and nutritional information panels online offers consumers detailed product and health information, which is especially valuable for those who have the time, ability, or specific dietary needs to assess this data. Research shows that access to full nutrition panels and ingredient lists enables more informed choices, particularly for people managing allergies, intolerances, or chronic health conditions.

Refer: *Maganja D, 2023 study: [Current food labelling practices in online supermarkets in Australia \(PDF\)](#); [FSANZ Labelling Requirements and Consumer Information](#) [FSANZ Labelling Requirements](#)*

However, not all consumers have the time, health literacy, or interest to analyse detailed nutrition information. The Health Star Rating system was developed as a front-of-pack summary to help consumers quickly compare the overall healthiness of similar products, especially when

shopping under time constraints or with limited nutrition knowledge.

Refer: [Health Star Rating System](#)

Studies have found that interpretive summary labels like HSR can positively influence healthier choices, particularly for those less likely to read detailed panels.

Refer: [Cecchini & Warin, 2016: Impact of interpretive nutrition labels](#); [Jones et al., 2019: Effectiveness of HSR](#)

Including HSR information online when present on the physical label ensures that the same quick-reference guidance is available to online shoppers, supporting equity between physical and digital retail environments. This aligns with Food Ministers' encouragement of HSR uptake and supports the strategic outcome of empowering consumers to make healthier choices as noted in the consultation paper.

While detailed nutrition and ingredient information is essential for some, the Health Star Rating provides a valuable, accessible summary for others, especially in time-pressured or low-literacy situations. Including HSR online when present on the physical label supports informed choice for all consumers and aligns with public health objectives.

## POLICY PRINCIPLES

We agree with the other proposed specific policy principles, as they provide a strong foundation for ensuring consumers have access to essential food safety, nutrition, and informed choice information when purchasing prepackaged foods online. However, we recommend that the principle regarding mandatory information should be altered to specifically address foods being sold past their best-before dates. In particular, we suggest that date marking information (such as best-before dates) should be required online when food is being sold past its best-before date.

### **Consumer Protection and Informed Choice:**

The best-before date is a critical piece of information for consumers, as it indicates the period during which the food is expected to remain at its best quality. While foods can often be safely consumed after their best-before date, their quality may deteriorate, and consumers have a right to know when they are purchasing such products. The Food Standards Australia New Zealand (FSANZ) Code requires date marking on physical labels for this reason.

Refer: [FSANZ Labelling Requirements](#)

The Codex Alimentarius guidelines (CXG 104-2024) allow for the omission of date marking information online in general, but also note that exceptions may be needed where relevant to consumer safety or choice.

Refer: [Codex Guidelines PDF](#)

Research and regulatory reports have highlighted that selling food past its best-before date without clear disclosure can mislead consumers and undermine trust.

Refer: [FSANZ Consumer Information](#)

As noted in the consultation paper, inconsistent or missing date marking information online has been identified as a gap in current practice.

## INTERNATIONAL PRACTICE

The European Union's Regulation (EU) No 1169/2011 requires that, where relevant, date marking information be made available to consumers prior to purchase, especially if the food is close to or past its best-before date.

Refer: [EU Regulation](#)

Requiring online disclosure of best-before dates when food is being sold past its best-before date is essential for transparency, consumer protection, and informed choice. This small but important alteration will help ensure that consumers are not misled and can make safe, informed decisions when purchasing food online.

## ADDITIONAL CONSIDERATIONS

We respectfully request consideration of the following additional points:

### **Inclusion of the need for food businesses *Right to trade/food Registration Certificate/Details to be included on the online platform.***

To safeguard consumers and enhance transparency in the online food marketplace, we support the need for food businesses to display clear evidence of their right to trade when selling food online. As highlighted in response to Question 14, there is a tangible risk that consumers may develop a false sense of security regarding the legitimacy and safety of online food sellers, especially in the absence of visible regulatory oversight. Requiring online businesses to prominently display registration details—such as their approval to sell food, registration/licence number, the name of the registration authority, and registered business address—on sales pages, social media listings, or dedicated websites is a crucial step towards restoring

consumer confidence and ensuring robust traceability of food products.

Unlike physical premises, where consumers can readily verify a business's legitimacy through certificates or other displayed evidence of registration, online retailers currently lack such mechanisms. This absence of visible regulatory credentials online exposes consumers to potential risks, particularly as the number of unregistered food businesses selling packaged foods online has surged since the COVID pandemic. Some of these businesses maintain highly professional-looking websites, further blurring the line between legitimate and illegitimate operators, and increasing the likelihood of consumers being misled.

To address these risks and strengthen consumer protection, we strongly advocate for the mandatory inclusion of registration or licence details, the name of the registration authority, and the registered business address with every online food listing, regardless of business size. This measure will not only empower consumers to make informed choices but also reinforce food safety standards and regulatory compliance in the rapidly evolving online food sector.

### **Including food wholesalers**

We strongly recommend that labelling provisions be extended to wholesale food service businesses supplying foods, beverages, and consumables to retail or food service outlets (such as cafes or caterers) in online environments. Retail and service businesses routinely rely on suppliers' websites to access accurate ingredient and allergen information—particularly when the original packaging and its label have been removed, for instance, when a café offers cakes and slices sourced from a food-service distributor. However, there are significant gaps in the accuracy and adequacy of information provided on online ordering portals for these distributors.

Given the recent rise in anaphylaxis notifications received by the City of Greater Geelong from the Department of Health (Vic), linked to food allergen incidents in food service settings, there is a clear and urgent need to address this risk. Mandating robust online labelling measures for wholesalers will ensure that retail and service businesses have access to critical ingredient and allergen information, enabling them to protect vulnerable consumers and respond confidently to customer queries. We urge that this recommendation be adopted to strengthen food safety and transparency across the entire online food supply chain.

## Accuracy in allergen labelling online

It is essential that future guidelines specifically address the issue of inaccurate allergen labelling by major online supermarket retailers.

There have been numerous cases where allergen statements fail to reflect the actual allergens present in products, as indicated by the ingredients list, or incorrectly list allergens that are not in the product according to its own labelling. This points to a lack of adequate checking for accuracy and raises concerns about the potential use of artificial intelligence (AI) to generate allergen statements.

We recommend that any use of AI by businesses to create or summarise allergen information should be subject to strict accuracy requirements in forthcoming regulatory guidelines, to ensure consumer safety and trust in online food labelling.

## Clarity in definitions and scope

The City believes that clear and comprehensive requirements be implemented for online food sales, regardless of business size or whether foods are made to order. At present, there is ambiguity surrounding whether smaller businesses that prepare foods to order—such as individually packaged decorated biscuits or portioned, packaged frozen meals—are held to the same labelling standards as those selling pre-packaged items. Often, consumers are unaware at the point of purchase that a product has been made to order, which further underscores the need for all online food retailers to provide full and transparent labelling. This consistency is essential to empower consumers with the information they need to make safe and informed choices.

To enable the change sought we recommend that the definition of the ‘online retail environment’ is robust and explicit, encompassing not only traditional e-commerce websites but also less conventional platforms, such as social media marketplace listings and posts. By doing so, this will ensure that smaller operators and informal sellers uphold the same level of transparency and accountability as larger online food retailers. This uniformity is vital to protect public health and foster consumer trust across all online food purchasing channels.

We strongly urge that further investigation be undertaken to address the current inconsistencies and confusion related to labelling requirements for foods made to order. This would include to clarify the distinctions between ‘ready for consumption’ and ‘immediate consumption’ foods and

the labelling requirements for each. The rapid proliferation of businesses offering potentially hazardous meals online has brought these issues into sharp focus and demands prompt regulatory attention.

Additionally, specific and practical guidance should be provided for managing best-before dates in online listings. We recommend that businesses either clearly state when products are past their best-before date in the product listing or refrain from selling such items if monitoring these dates is not feasible. This measure will further safeguard consumer interests and uphold food safety standards in the evolving online marketplace.

For these reasons, we advocate for the adoption of these recommendations to ensure consumer protection, food safety, and consistent regulatory compliance across the entire spectrum of online food sales.

## SUMMARY

In summary, the outlined recommendations aim to strengthen consumer protection and enhance food safety within the rapidly evolving landscape of online food sales.

By implementing comprehensive labelling standards and clear regulatory guidelines, we can ensure consistency and transparency across all online retail platforms.

We welcome the opportunity to discuss this feedback further and collaborate with relevant stakeholders to advance these important improvements for the benefit of all consumers.

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