

GROWING TOGETHER 2035

Aotearoa Horticulture Action Plan

Thinking of exploring use of health claims for your fruit or vegetable product?
Read our case study on Zespri's health claims journey.



Aotearoa Horticulture Action Plan Case Study – Zespri's Health Claims Journey

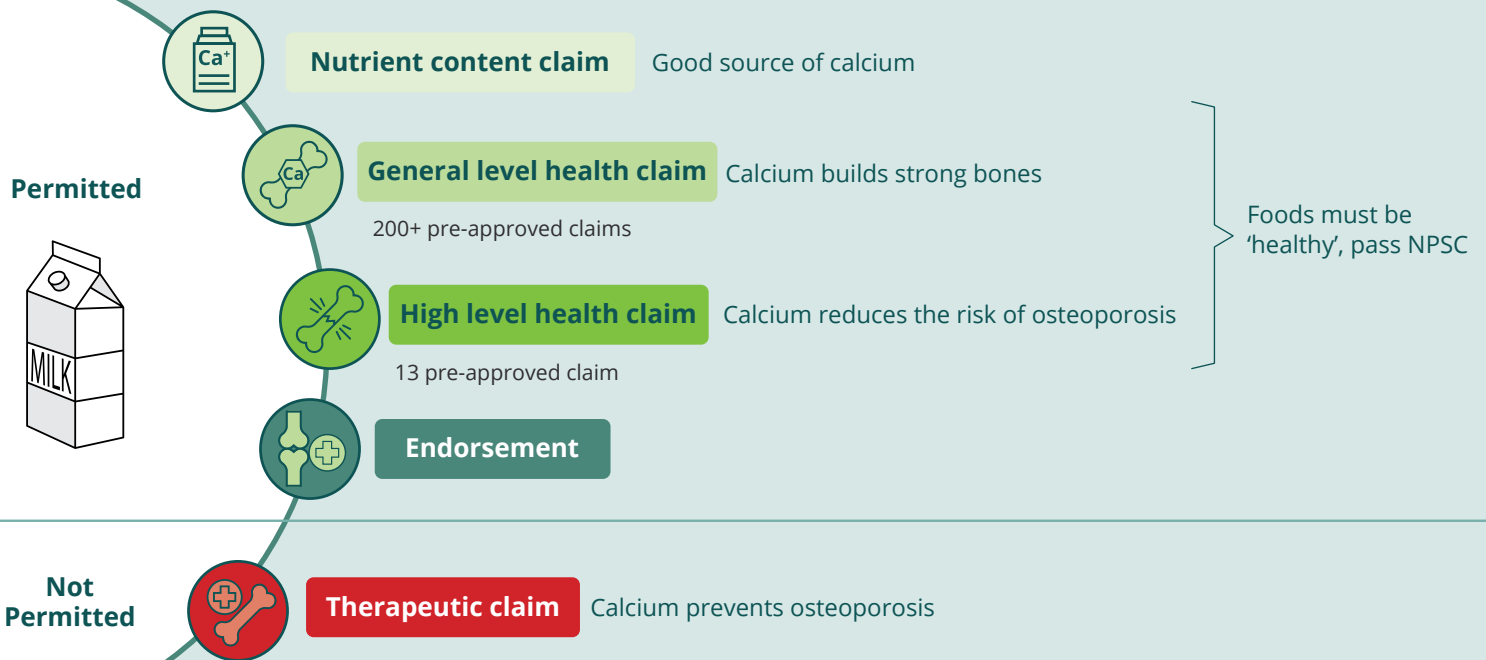
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Background

Zespri is 100% owned by current and former kiwifruit growers and is the largest marketer of kiwifruit globally, providing consumers in more than 50 countries with fresh, healthy and great-tasting Zespri Green, RubyRed™ and SunGold™ Kiwifruit.

To support its marketing, Zespri commissions research on the health benefits of kiwifruit consumption. This investment is guided by key strategic areas that reflect and respond to global market trends and demands. One of Zespri's focus areas is continuing to build an evidence base that supports marketing around the health benefits of consuming kiwifruit. Zespri has a long track record of commissioning research to support this, and to further their goal of increasing healthy eating occasions for consumers around the world.

One of the key means by which Zespri furthers its health communications is by health claims which are determined by a combination of scientific, consumer and regulatory considerations. Zespri's marketing has a heavy focus on robust and dependable scientific evidence, to maintain and grow its credibility and trusted position in the global kiwifruit trade. There are varying levels of health claims that Zespri utilises, from more basic nutrient content claims to general-level health claims and, ultimately, high-level health claims. In New Zealand the claims that are permitted are governed by The Australia New Zealand Food Standards Code (the Code) as outlined in the figure below. In New Zealand, the Ministry for Primary Industries is responsible for enforcing the Code. However, in overseas markets different regulations will apply and the classification of claim may differ (e.g. the differentiation of general- versus high-level health claims).



Examples of the claims permitted under Standard 1.2.7 of the Code using milk as an example. NPSC = Nutrient Profiling Scoring Criterion.



Nutrient Content Claims

Understanding kiwifruit's nutritional value is of paramount importance. Comprehensive nutrient testing is conducted by accredited laboratories in New Zealand each season. Zespri partners with The New Zealand Institute for Plant and Food Research Limited to conduct this testing and store data on the publicly available New Zealand Food Composition Database. It is really important to ensure good sampling (e.g. across multiple orchards) so that the analytical dataset is representative of the average nutritional value for the crop. It is also sensible to analyse across multiple years to eliminate variation that may occur because of different climatic conditions, although this may be necessary only for some of the more sensitive nutrients, like vitamin C.

Having robust nutrient content data enables Zespri to make use of nutrient content claims. This is a claim that describes the level of a nutrient contained in a serve of the food e.g. "source of calcium", "high in fibre and low in fat". For kiwifruit, common claims are "source of fibre" for green kiwifruit or "high in vitamin C" for SunGold kiwifruit, for example. Zespri can also claim "100 % of your daily vitamin C needs" in all their overseas markets because kiwifruit's vitamin C content exceeds the recommended daily intake (RDI) in those countries. The possible nutrient content claims that can be made vary by country to some extent because of differences in RDIs and in what is counted as a serve.



Health Claims in the New Zealand/ Australian Markets

A type of general-level health claim that Zespri utilizes is pre-approved health claims. Those are where there is an established relationship between a nutrient and a health outcome, e.g. vitamin C and supporting immunity. Provided a food meets the Nutrient Profile Scoring Criteria (NPSC), if it contains enough of a specific nutrient, a claim can be made. A serve of SunGold kiwifruit contains sufficient vitamin C (at least 10% of the RDI) to make any one of a number of pre-approved claims related to vitamin C's impact on health. For example, "SunGold contains vitamin C which contributes to normal functioning of the immune system". However, the wording must clearly link the health outcome with the health nutrient, not directly with the product.

In addition to nutrient content claims and pre-approved health claims, Zespri invests in independent scientific research, including human clinical trials. This has resulted in an ever-growing body of scientific evidence of the health benefits of kiwifruit consumption. If these studies have been conducted in accordance with robust scientific practice and have been published in reputable peer-reviewed journals, they can be compiled into an evidence dossier and a self-substantiated general level health claim can be lodged with FSANZ. All dossiers for self-substantiated general level health claims are evaluated by the Ministry for Primary Industries to ensure they meet the regulatory requirements. In 2014, Zespri lodged New Zealand's first self-substantiated health claim through FSANZ - *Zespri® Green Kiwifruit can contribute to normal bowel function*. In 2021, Zespri built upon that claim - *Zespri® Green Kiwifruit improves gastrointestinal comfort*.

Health Claims in International Markets

In 2013, Zespri decided to aim for a health claim at the European Food Safety Authority (EFSA) regarding green kiwifruit's impact on gastrointestinal health. Although numerous in vitro studies, animal studies and human clinical trials pointed towards gut health benefits, it was deemed necessary to conduct one further large clinical trial. This started in 2014 and ran for three years in Italy, Japan and New Zealand, with 180 participants recruited. The results from this trial along with other evidence were compiled into an evidence dossier and submitted to EFSA in 2018. After several rounds of review and resubmission, EFSA published a positive opinion that *regular consumption of green kiwifruit maintains normal defecation*. Zespri is the first New Zealand company to receive a health claim from EFSA and this is the first successful claim for a fresh fruit. The claim is currently being considered by the EU member countries as it goes through the approval process for ratification into EU law.



Value Generated

Determining exact impacts from projects and claims on sales volume is difficult, but it is clear that Zespri's brand value is closely associated with health attributes. Any improvements to Zespri's health attribute credentials will result in increased brand value, driving differentiation in the market with increased premium and purchase frequency. Zespri's consumer research has found an upturn in sales following health-driven campaigns and research has found that approximately 20% of the consumer purchase decision is principally for health reasons.

Building a strong, science-backed evidence base of a product's health impacts can help with marketing campaigns and direct communication with healthcare professionals in target markets. For example, many of Zespri's research studies are published in scientific journals and presented at international conferences. Often, these studies are picked up by media and are the subject of blog articles that generate consumer interest. Ultimately, if enough favourable research is conducted, it can be used as scientific substantiation for general-level or high-level health claims to provide a credible base upon which to drive sales and premium prices. Failure to provide scientific evidence with claims and non-compliance with the regulations can result in corrective action by the regulator/enforcer and a loss in consumer trust which, once lost, is hard to retrieve.

Research shows consumers focus on nutritional benefits when purchasing premium fruits & vegetables.

When consumers are asked about the attributes for which they are willing to pay more, taste and trust emerge as the leading factors. These elements play a crucial role as key drivers when consumers opt for premium fruits and vegetables. However, purchases of produce that aligns with the nutritional needs of consumers are also significant.

Research conducted by Kantar reported that 30% of those surveyed* stated they would pay more for produce that provides nutrition they are looking for, comparable with coming from a local source, or being certified organic. Taste and trusting the product is safe are higher drivers, at 39% and 37% respectively.

Useful resources related to nutritional claims:

- Nutrition, Health and Related Claims Standard of the Australia New Zealand Food Standards Code ([Australia New Zealand Food Standards Code – Standard 1.2.7 – Nutrition, health and related claims \(legislation.gov.au\)](#))
- Global Regulatory Environment of Health Claims in Foods ([Global Regulatory Environment of Health Claims in Foods \(mpi.govt.nz\)](#))
- New Zealand Food Composition Database (<https://www.foodcomposition.co.nz/>)
- United Fresh, guidance for members on complying with Standard 1.2.7 ([United Fresh | Food Law](#))
- Food Standards Australia New Zealand ([Notifying a self-substantiated food-health relationship](#))
- Health and nutrition content claims for food and drink: Health and nutrition content claims for food and drink | NZ Government ([mpi.govt.nz](#))
- Getting your Claims Right Guidance: <https://foodregulation.gov.au/internet/fr/publishing.nsf/Content/publication-Getting-Your-Claims-Right>

*Findings are drawn from the third wave of research to support NZTE's Made with Care campaign, driving awareness and preference for New Zealand as a source of premium food and beverage products.

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How does this piece of work deliver on the Aotearoa Horticulture action plan?

The case study contributes to two actions:

- Map the process for qualifying relevant stand-out marketable attributes (e.g. nutritional, sustainability claims), including examples of requirements, typical costs and regulatory pathways (Underpinned by science and knowledge)
- Increase education on the use of health and nutrition claims in horticulture (Optimize value)