

## **Submission to:** **Food Standards Australia New Zealand**

---

**In response to:**

*Consultation Paper - Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel*

██████████  
Corporate Nutrition Manager, Australia

Food Environment & Science  
Locked Bag 7,  
Central Coast Mail Centre, NSW 2252  
Phone: (02) 4348 7777  
Fax: (02) 4977 2490  
E-mail: ██████████

**Issue No:** 1.0

**Issue Date:** 24 February 2015

*"Sharing health and hope  
for a better life"*

Table of Contents

**Executive Summary..... 3**  
**Introduction..... 3**  
**Response to specific questions ..... 3**

## Executive Summary

Sanitarium uses the per serve column of Nutrition Information Panels (NIP's), to help educate consumers on the amount of nutrients they will consume in a realistic portion of food product, or meal featuring our food products. In addition, the per serve column is used to demonstrate compliance of our products and claims with various standards within the Australia New Zealand Food Standards Code.

We believe the advantages of including the per serve column outweigh the disadvantages, and recommend that this column remain a mandatory component of NIP's.

## Introduction

Sanitarium Health and Wellbeing began in 1898 with the vision to help people 'learn to stay well'. Our mission is to 'to share with our community a message of health and hope for a better life. We have been committed to this philosophy for over 100 years and it is the reason we exist today. Sanitarium also believes that good business is based on trust, respect and community involvement.

Sanitarium has a strong history of educating the community about healthy eating and healthy lifestyles. All of Sanitarium's activities have twin goals in mind - to provide healthy foods that actively improve our community's health and well-being, and to offer easy-to-understand nutrition information and practical health advice.

Sanitarium Australia and Sanitarium New Zealand are owned and operated by Australian Health & Nutrition Association Limited and New Zealand Health Association respectively. We produce over 150 products and employ approximately 1700 people in our manufacturing and distribution sites throughout Australia and New Zealand.

Sanitarium welcomes the opportunity to comment on the development and evolution of the Australia & New Zealand Food Standards Code. We believe we can provide a unique perspective and give valuable suggestions into the food policy and standards development in Australia and New Zealand.

*Information contained in this submission has been drawn from the experiences of Sanitarium, and contains no commercial-in-confidence material – unless otherwise highlighted.*

## Response to specific questions

### **Q1. How does your organisation use per serving information in the nutritional information panel?**

Sanitarium uses per serving information in the NIP panel in a number of ways:

- For breakfast cereals consumed with milk:
  - Some of our breakfast cereal products include a "per serving with milk column" as this gives consumers an indication of the nutrient content of the breakfast they will be eating (e.g. 2 Weet-Bix with 125mL reduced fat milk)
- Individual packaging for cereals and liquid breakfast products where the entire package contents are meant to be consumed. This highlights the amounts of energy and nutrients that will be consumed if the entire pack contents are consumed.
- For products where vitamin, mineral, fibre and protein claims are based on per serve quantities. This information is required to comply with Food Standards Code requirements.

- To compare the nutrient content of a serving of different foods/products. For example, as per the claim on Up & Go, to compare the protein, energy and fibre content of one 250mL serving of Up & Go to that of 2 Weet-Bix plus 125mL (1/2cup) of full cream milk.

**Q2. Are there any particular food categories or types of food packages for which per serving information is particularly useful?**

- Products sold as single servings.
  - For example, Up & Go which is sold in single serving packs of 250mL and 350mL / serve. It is more relevant for consumers to know the nutrient content, such as protein, fibre, energy and sugar, of the entire pack rather than 100mL of the product as they would normally consume the entire contents. The per serve information clearly identifies to consumers how much of each nutrient they are consuming in an entire single serve pack.
  - Per serve information on single serve packs is useful for comparing how much would be consumed compared to other single serve products of the same type eg snack foods.
- Individual serving packs of breakfast cereal contain between 20 to 50g of product, not 100g. Individual packs are used in hospitality settings and available at convenience outlets and it would be useful for consumers to have the nutrient content of the serving they are consuming.
- For some products where serving sizes are easy to visualise e.g. 30g Weet-Bix = 2 biscuits, 50g muesli = 1/2cup, it is more useful and relevant to consumers to have per serving information.
- Products with very small serving sizes.
  - An example of this is Marmite, which is designed to be used in small amounts, where the serving size is 5g.
  - Marmite contains 3,310mg sodium per 100g. The serving size of 5g is the realistic amount that would be consumed on one slice of bread and this contains only 165mg sodium. It is unlikely that consumers would consider or calculate the amount of sodium in one 5g serving, so per serving information for all the nutrients is very useful in this instance.
- A recent New Zealand television show focused on how much sugar is 'hidden' in foods. It highlighted that one 250g jar of Marmite contains 7 teaspoons of sugar. What it failed to point out was that, due to the way in which the product is used, the serving size is small and one 5g serve contains only 0.6g (approx. 1/8<sup>th</sup> teaspoon) of sugar. Having serving information on packaging provides consumers with nutrition information relevant to the quantity of product they will consume.
- Multipack products, for example muesli bars, snack foods. Per serving information tells consumers the nutrient content of the pre-packed portion they will be eating, rather than them having to calculate this if per 100g/mL quantities only are included.
- Formulated Supplementary Foods have per serving criteria for some nutrients, so per serving information should be included.

**Q3. Labelling Review recommendation suggests the per serving information be voluntary unless a daily intake claim is made. Do you support this approach?**

- No. Per serving and per 100ml/g labelling should remain mandatory, regardless of daily intake claims being made.
- If per serving information becomes voluntary, we support per serving information being mandatory if daily intake claims are made.

**Q4. If per serving information in the NIP was voluntary, this would result in more variability in the format of NIPs across the food supply. Do you think this would be a problem? Why/why not?**

- Yes, we consider this would be a problem. There is already large variability in the NIP formats being used. That is, as well as per serving and per 100g/mL information, NIPs can also include ‘%DI per serving’ and ‘per serving as prepared or consumed with other foods’ information. Removal of the per serving column would make it even more confusing for consumers as they will be dealing with a greater variety of formats.
- The removal of the per serving column increases the potential for consumers to make poorer food choices as the nutrient quantity per serving is there to help consumers understand what they are consuming when they eat a reasonable serving of the product.
- Increased possible variations of NIP formats, such as making per serve information voluntary or only mandatory when content claims are made, increases the complexity of ensuring compliance with the Food Standards Code for both manufacturers and also enforcement agencies.

**Q5. If per serving information in the nutrition information panel was voluntary, do you think the inclusion of per serving information in the nutrition information panel should be mandatory when a nutrition content claim about vitamins and minerals, protein and fibre, omega-3 or fatty acids is made?**

As stated, we support the inclusion of the per serve column in the NIP. However, should it become voluntary, then the full per serve information should be presented when nutrient content claims are made. As these claims relate to per serve value, it is essential that they are listed, such as to enable comparisons between different foods. For example, Weet-Bix is classified as a source of fibre and contains 10.1g fibre per 100g. Up & Go however can also be classified as a source of fibre but it contains 1.5g fibre per 100mL. Therefore, the per serve information is essential to demonstrate that, based on a per serve amount (30g for Weet-Bix and 250ml or 350ml for Up&Go), the 2 products provide similar amounts of fibre.

**Q6. If per serving information in the nutrition information panel was voluntary, do you think the inclusion of per serving information in the NIP should be mandatory in any other specific regulatory situations?**

We believe the per serve information should be mandatory, however if it became voluntary, the per serve column should be mandatory when a comparative claim for the amount of nutrient in a serving, is made. This allows manufacturers to easily demonstrate the basis for their claim and enables consumers to have a clearer understanding of the broader nutritional content of the amount of the product on the which the claim is based.

In addition, the per serve column should be included when the product is sold or available as a single serve option, eg single serve beverages, individual portion control cereals.

**Q8. From your perspective, what are the advantages and disadvantages of per serving information in the nutrition information panel being voluntary? Please provide evidence where possible.**

**Disadvantages:**

- Consumers are unable to see what nutrients they would be consuming in the context of a varied diet. For example, Marmite yeast spread contains 3310mg sodium per 100g, however the amount of

sodium consumed per serving is just 166mg, which is far less than the amount of sodium in 2 slices of white bread (274mg/60g)<sup>1</sup>.

- It is a missed opportunity to educate consumers on suggested serve sizes outlined in Government Healthy Eating guidelines. When serve sizes are realistic, the per serve column provides a useful education tool for consumers to use as a guideline when determining how much they should eat (i.e. ½ cup (50g) Muesli).
- If the per serve column was voluntary, it may become more labour intensive for manufacturers and food enforcement agencies to monitor compliance with various sections of the Food Standards Code. For example, Standard 2.9.3 requires products to contain a minimum amount of protein and energy per serving. Similarly, many nutrient content claims are based on the quantity in a reference serving.
- Consumers would be faced with an even greater range of NIP formats, which may bring confusion among consumers if some companies remove the “Per Serving” panel and others don’t. Concerningly, some consumers may end up comparing the per 100g column against the per serve column from another product.
- Will not allow people to accurately compare the nutritional content of a serving of a food in one category against another food in a different category. For example, we have experienced consumers in the past comparing the amount of sugar in 100g of San Bran cereal against the amount of sugar in 100g of jelly and asked why there was the same amount of sugar in them both. They did not consider the realistic serving size of each. Similarly, cheddar cheese contains 22.9g saturated fat/100g, or 6.9g /30g serve while regular milk contains 2.4g saturated/100mL, and 6.3g /250mL serve. Without the per serve column, consumers may have difficulty determining that a serve of milk contains a similar amount of saturated fat as a serve of cheese.
- Consumers may have difficulty estimating the nutrient content of products in large, single serve containers. Sweetened drinks contain around 10g of sugar/100mL, but consumers would consume up to 60g if drinking a 600mL bottle.
- Companies may pick and choose whether to include per serving information depending on whether it is advantageous to their products or not. This does not give a level playing field for companies who choose to include the per serve column to help educate consumers about appropriate serve sizes.

**Advantages:**

- More pack space would be available – this could allow the font size of other label information to be increased in size.
- There may be less consumer confusion as there will be less information to navigate, however this would only be the case if the majority of companies remove per serve column.
- Will reinforce the importance of considering per 100g nutrient quantities when comparing two products within a category.

**Q9. Do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary?**

As outlined above, we support the mandatory declaration of the per serve column in the NIP.

---

<sup>1</sup> NUTTAB 2010, Bread, White, NFS