



**Australian Nut Industry Council and Nuts for Life submission:
Consultation Paper – Labelling Review Recommendation 17:
Per serving declarations in the nutrition information panel**



Introduction

The **Australian Nut Industry Council (ANIC)** represents the Australian tree nut growing industries (almonds, chestnuts, hazelnuts, macadamias, pecans, pistachios and walnuts) whose growers are members of Horticulture Innovation Australia. ANIC supports the activities of the *Nuts for Life* health education campaign.

Nuts for Life is a collective nutrition communications/ education initiative by the Australian Tree Nut Industry (Australian tree nut growers as well as processors, packers and importers of all tree nuts) to provide generic, useful, credible and up-to-date information about the nutrition and health benefits of eating nuts. It is funded through voluntary contributions from the Australian Tree Nut Industry as well as government matched funds for R&D activities through Horticulture Australia. Nuts for Life has been in operation for 10 years - since 2003. Nuts for Life is interested in health-related research and communication for all of the globally-traded and consumed tree nut varieties in Australia namely: almonds, Brazil nuts, cashews, chestnuts, hazelnuts, macadamias, pecans, pine nuts, pistachios and walnuts.

Together we appreciate the opportunity to comment on this consultation paper and provide the following answers to the questions raised in the consultation paper.

Question for Submitters

Q1	<i>How do you or your organisation use per serving information in the nutrition information panel on food labels?</i>
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The Australian Health Survey uncovered that Australians are eating on average 6g nuts per person per day - well short of the 30g serving size recommended in the Australian Guide to Healthy Eating as part of the Australian Dietary Guidelines.(1) The 30g serve is also the most common minimum serve size for much of the research into the health benefits of nuts.

For example a 30g serve of nuts consumed more than five times a week can reduce the risks of cardiovascular diseases by 30-50% (2-7) and overall mortality by 20% (8), 30-100g of nuts reduces blood cholesterol(9) and even the long term five year PREDIMED Mediterranean diet study included a daily 30g serve of nuts with good outcomes on cardiovascular risk and mortality.(10,11)

As a result Nuts for Life developed a new logo for the industry to use on pack – The Healthy Handful logo which includes the 30g serve and we have been encouraging our members to use a 30g serve where possible in the per serving column of the nutrition information panel to help highlight this serving size.



For many years people have been concerned about the total fat content of foods rather than the quality of fat which has cast nuts in a negative light. The total fat content of nuts ranges of 1-74% (chestnuts to macadamias)(12). Seeing such a high number in the per 100g column can be misinterpreted as being unhealthy. For this reason we see the per serving column as an important education tool for not only the recommended 30g serving size but also that this serving size provides a much lower level of total fat.

Since many nuts are sold in bulk bags and re-sealable bags the serving size helps people to understand how many serves are in a bag and portion appropriately.

Given 20% of Australians have low level numeracy skills(13) many may find it difficult to make portion calculations if only the per 100g/mL column is mandatory.

We note the FSANZ user guide for Standard 1.2.8 outlines that if the serving size of a product is equal to 100g the two columns “per serving” and “per 100g” are required to be displayed in the NIP. We do not think it is not necessary to have two identical columns when a statement to the effect that the serving size is 100g would suffice. This is particularly relevant to nut packers that pack in clear rewind or clear tubs with a sticker on the front and back. Sticker space is at a premium.

Q2 *Are there any particular food categories or types of food packages (e.g. single serve packages) for which per serving information is particularly useful? If so, what are they? Explain why the information is useful.*

Portion controlled packs of nuts (30-50g) can be found in supermarket snacking aisles and having a per serving column in the NIP offers clear information to consumers about the amount of nutrients they are eating when they consume a single pack.

Again these portion packs also reinforce our Nuts for Life preferred serving size of 30g.

Similarly muesli/ nut bars are sold as in multi packs but the per serving column in the NIP provides details of nutrients per bar.

Q3 *The Labelling Review recommendation suggests that per serving information be voluntary unless a daily intake claim is made.*

Do you support this approach? That is, do you think declaration of per serving information in the nutrition information panel should be mandatory if a daily intake claim is made (e.g. %DI or %RDI)? Give reasons for your answer.

Yes Nuts for Life believes that when any nutrition or health claim is made, whether it is a %DI claim or a nutrient content claim, these claims need to be substantiated by what percentage of the nutrient is found in a serve. Especially since certain nutrient content claims have nutrient criteria set per serve eg Standard 1.2.7 sets nutrient criteria for protein or fibre per serve. So per serving information in the nutrition information panel needs to be mandatory.

Q4 *As noted above, there is currently variation in the format of NIPs on food labels because of voluntary permissions for the use of %DI labelling and the option to include a third column for foods intended to be prepared or consumed with at least one other food. 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?*

The Health Star Rating front of pack program recommends consistent styles to reduce consumer confusion so consistent NIPs designs will also help achieve this. For this reason we believe the current NIP system with mandatory per serving columns should remain in place.

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, minerals, protein, omega-3-fatty acids or dietary fibre is made? Give reasons for your answer.*

As noted above in Q3 yes per serving columns should be mandatory when any nutrient and health claims are made as many of these nutrient content claims have criteria expressed as an amount of nutrient per serve eg protein and fibre claims.

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? Explain your answer.*

We are unaware of any other regulatory situations.

Q7 What additional studies examine consumer use and understanding of per serving information in the nutrition information panel on food labels? Please provide a copy of studies where possible.

We are unaware of any further studies.

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.

Advantages of voluntary - should not be mandatory

For nut products that have small labels or stickers on clear rewind packaging or nuts sold in bulk bins or self pay and weigh, label space is premium so removing a column from the NIP will generate more space. But it also means they will not be able to make nutrition and health claims.

Disadvantages of voluntary – should be mandatory

Twenty percent of consumers have low level numeracy skills.(13) Consumers themselves will need to calculate how much energy/nutrients they would be consuming when they consume either a portion of a product or the entire product pack.

Per serving column helps consumers understand what amount of nutrients they will be consuming from a single serve. This could be important for those with medical conditions following special diets.

Nutrition and health claims on pack can be substantiated by the information in the NIP.

From a public health perspective the number of servings in a pack can help reflect recommended serving sizes such as 30g (handful) of nuts in the Australian Dietary Guidelines.

Removing per serving column could make NIPs smaller and harder to read so legibility requirements need to be reinforced.

Q9 Do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary? YES/NO/UNCERTAIN

Please give reasons and evidence to support your view.

If you are UNCERTAIN, please indicate what information you would need in order to form a view.

NO – we believe the per serving information should remain mandatory because 20% of consumers do not have adequate numeracy skills (13) to calculate nutrients in a portion from 100g data. It also supports the education programs of Nuts for Life to raise the awareness of the importance of a daily 30g serve of nuts.

This response is submitted by Lisa Yates Program Manager and Dietitian Nuts for Life and approved by Ms Chaseley Ross Executive Officer Australian Nut Industry Council and Mr Chris Joyce, Chair Nuts for Life.

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