

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

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1. *How do you or your organisation use per serving information in the nutrition information panel on food labels?*

Per serving information is used to assess snack items in the National Healthy School Canteen Guidelines (Australian Government 2010). These guidelines are used for menu selection by school canteens, as well as many remote community stores. Community stores are assessed using per serve nutrition information for some licensing requirements.

Per serving information is often used where serving sizes are smaller than 100g and for single serve packs. For example takeaway options where the per 100g criteria meet healthy canteen guidelines but the serve size, if likely to be consumed in one sitting, provides a significant contribution to an individual's recommended daily intake.

2. *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.

Per serving information is useful for single serve packages and multipacks of single serve packages.

For some products nutrition information per 100g may be similar but the presentation of the product means that there may be large variations in serve sizes. For example, when comparing two single serve snack bars one weighing 25g, one weighing 60g both packaged as a single bar the information per 100g is less helpful if only a single bar is consumed or where one meal weighs 500g and another 750g.

3. *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.

Per serving information in the nutrition information panel should be mandatory if a daily intake claim is made (eg %DI or %RDI) **and** for the Health Star Rating regardless of whether it makes a daily intake claim. The Health Star Rating is based on information per 100g. It does not provide information on serve size. Providing information per serve will help prevent this information from misleading consumers for example 600ml 100% fruit juice with 5 stars (1080kJ) and 600ml water with 5 stars (0kJ)

4. *As noted in Section 4, 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?

If the format is not defined in the Standard there will be more variability. More variability is likely to increase confusion and mean that consumers are less able to compare between products and make an informed decision.

5. *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.*

Information on the amount of the claimed nutrient per serve should be provided where a claim is made to enable informed decisions without high level numeracy skills.

6. *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*

The declaration of energy and nutrients per serving should be required for products using %DI, %RDI or the Health Star Rating. Consumer research commissioned by the Department of Health showed that consumers used the Health Star Rating icon to make decisions over the healthiness of the product, but trusted it more if further information was available including information per pack. Proposed Front-Of-Pack Food Labelling Designs: Qualitative Research Outcomes (2013, Hall and Partners Open Mind) Proposed Front-Of-Pack. Food Labelling Designs: Quantitative Research Outcomes (2013, Hall and Partners Open Mind)

If the declaration of energy and nutrients per serving is voluntary the format of the declaration should be consistent to minimize further consumer confusion. That is if manufactures choose to display per serve information, then it should follow a mandatory format.

7. *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.*

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8. *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.*

The usefulness of information per serve is reliant on the serve size being relevant and not misleading.

The description of 'per pack' for the *Health Star Rating* has tried to address concerns where for example a product typically consumed in a single sitting states it contains 1.6 serves.

'Per pack' (when presented as a single portion), or 'Per [reference portion]' (when presented as a multipack with individual pre-portioned units intended for consumption in a single sitting), (2014, Australian Government)

Per serving information and per 100g information presented together may be confusing

9. *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

Uncertain. There may be other regulatory options that help prevent misleading conduct and ensure sufficient information for consumers to make an informed choice and help reduce the regulatory burden.

The declaration of energy and nutrients per serving should be required for products using %DI, %RDI or the Health Star Rating. Declaration of energy and nutrients per pack should also be required for items to be consumed in a single sitting.

If the declaration of energy and nutrients per serving is voluntary the format of the declaration should be consistent to minimize further consumer confusion. That is if manufactures choose to display per serve information, then it should follow a mandatory format.

References

2010, Australian Government, National Healthy School Canteens - Guidelines for healthy foods and drinks supplied in school canteens,

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