

2<sup>nd</sup> March 2015



**Dietitians NZ**

*Ngā Pukenga Kai Ora o Aotearoa*



Food Standards Australia New Zealand

Submitted via email to: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

To whom it may concern

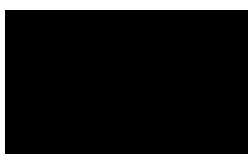
Re: Submission on Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel.

Dietitians New Zealand endorses the submission submitted by member Lyn Gillanders on behalf of Auckland City Hospital. This submission reflects the comments and opinions of our overall membership. We trust the comments made in this submission will be given due consideration.

Dietitians NZ is the professional association of registered dietitians and associated nutrition professionals. With a membership of approximately 630, we represent the largest group of fully trained food and nutrition professionals in New Zealand. Dietitians are registered health professionals who meet standards required by the NZ Dietitians Board under the Health Practitioners Competency Assurance Act (HPCA) 2003. In New Zealand, by law, dietitians must be registered with the Dietitians Board and hold a current practising certificate, work within a specified scope of practice, participate in a continuing competency programme and adhere to a Code of Ethics. Additionally registered dietitians can undergo further training to be legally qualified to prescribe nutrition supplements.

The full submission is provided in a separate attachment.

Yours sincerely,



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President, Dietitians NZ

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## **Submission on Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel.**

Thank you for opportunity to comment on the proposal to change per serving declarations in the nutrition information panel. This submission has been compiled on behalf of 33 dietitians in Nutrition Services at Auckland City Hospital. The services provided by this department cover acute medical and surgical care, solid organ transplants intensive care through to older people's health, maternal health and general outpatients. The dietitians have a major role in creating patient resources for community use for many different health related conditions

### **Q1: How do you or your organization use the per serving information in the nutrition information panel on food labels?**

- Dietitians use the per serve information on the NIP for patient education and the life-long nutrition management of patients with chronic diseases including diabetes, liver and kidney failure, heart disease, obesity and gut related disorders. The majority of this patient group requires ability to make judgments about portion size in their day to day life. The per serve information on NIP assists people assess the serve size and appropriateness of the serve size for their requirements.
- Some people have low literacy and or number skills and for others English is a second language. Studies have shown that the adult population has a reading age of about 10 years. Common experience suggests people do not have the skills to confidently and consistently calculate portions or serve size from the 100g column accurately. A consequence is that the nutritional information supplied then becomes completely irrelevant for the people who require it the most.
- As part of transition of care the per serve column is used when educating children and young adults how to manage their own diets. This is an easier concept to learn than attempting to calculate serves from 100g information.
- Per serve information is also used to educate parents and patients as to what is an appropriate portion size for their/their child's age and requirements.

### **Q2: Are there any particular food categories or types of food packages for which per serving information in particularly useful? If so what are they? Explain why the information is useful**

- This information is most useful for individually packaged or presented foods or packaged foods in sizes greater than a single serve, for example muesli bars, bread, crackers, biscuits, yoghurts, potato crisps, sausages, pizza, sauces, rice, pasta, jellies,

milk and milk alternatives. However all food items having a NIP panel with serving size provides benefits for making healthy food choices.

- The information is essential for people seeking to manage their food intake in relation to their health goals
- We support the use of common standard household measures and equivalent metric quantity and number of serves per container

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

- No. As noted this approach will not allow informed consumer choices for many people

**Q4: As noted in section 4, there is currently variation in the format of NIPs on food labels because of volunteer permissions for the use the %DI labeling and the option to include a third column for foods intended to be prepared or consumed within at least one other food. If per serving information in the NIP was voluntary this would results in more variability in the format of NIP across the food supply. Do you think this would be a problem?**

- It is important that NIP's are kept as clear as possible to avoid misinterpretation of information by consumers. The NIP needs to be consistent in their information and lay out. The per serve is more important than %DI for individual nutrients.

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

- Yes. It is the consumers right to know product information when claims are made. If there is no regulation in this area then there is concern a number of inappropriate claims would increase confusion and mislead consumers. However, we do not support per serving information being voluntary, we support it being mandatory.

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

**N/A**

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

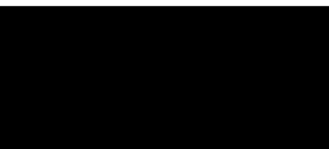
Disadvantages to per serve information being voluntary:

- Per serve gives a guide as to amount of food considered to be a single serve.
- People cannot visualize what 100g of food/product looks like.
- People who wish to manage their own health through making healthy food choices who use the per serve information on NIP on a daily basis when purchasing food. This should be considered in the light of the burden of chronic disease including obesity in our country.

**Q9: do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary? NO**

**Please give evidence and reason to support your view. If you are UNCERTAIN please indicate what further information you would need.**

In NZ and Australia we have been in a privileged position to have both 100g and per serve data on NIP. This information has enabled NZers to make more informed choices around food and should not be discontinued



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