



## **Labelling Review Recommendation 17**

**February 2015**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for better food, better health, and wellbeing for all. DAA appreciates the opportunity to provide feedback on Labelling Review Recommendation 17 by Food Standards Australia New Zealand.

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## **DAA interest in this consultation**

DAA aims to foster food and nutrition knowledge and skills across the community, and advocates for a safe and nutritious food supply in which the community has confidence.

As experts in nutrition, Accredited Practising Dietitians (APDs) assist people with general and special nutrition needs to interpret and apply information from food labels when choosing foods and beverages. APDs also provide nutritional expertise relating to the development of food products that must comply with the current regulatory framework.

## **Recommendations**

DAA does not support Recommendation 17 that the amount of nutrients per serve in the Nutrient Information Panel (NIP) be no longer mandatory unless a daily intake claim is made.

DAA recommends that per serving nutrition information should remain as a mandatory inclusion in the NIP for all foods.

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

DAA notes that the body of evidence on which to make recommendations is limited and would like to see further research into labelling which supports consumers to make healthy food choices.

## **Discussion**

DAA has prepared the following responses to the questions set out in the consultation paper.

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

APDs use per serving information in the nutrition information panel on food labels in a variety of ways, depending on their practice setting.

APDs use this information to educate individual or group clients on appropriate food choices and serve sizes in the context of healthy eating or medical nutrition therapy. APDs assist clients to estimate the nutrients in a product for application in one meal or to calculate the intake for a day. Per serving information is also being used to

compare nutrient contents across products. This is particularly useful in terms of assisting consumers to achieve nutrient intake recommendations.

In addition, where a listed serve size is reasonable, per serve information is used to determine the exact amounts of nutrients being consumed. Whilst this can be calculated from the per 100g column, it is simpler for consumers if the information is already provided.

Per serving information is used by APDs and canteen managers to assess snack items in the National Healthy School Canteen Guidelines.<sup>1</sup> These guidelines are used for menu selection by school canteens, as well as remote community stores. If serve size information was made voluntary this could introduce significant problems for canteen compliance with the guidelines.

APDs consulting to the food industry might use this information when advising manufacturers about the development of food products.

**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.**

DAA considers that per serving information is potentially useful for all foods and beverages, because it provides consumers with a guide to what is in a reference serve of the food/beverage, as suggested by the manufacturer. Portion control has been identified as one tool for managing total energy intake which is important in the context of managing increased prevalence of obesity in Australia.<sup>2</sup>

The level of health literacy varies in the community and some consumers do not identify with serves of food. The evidence from the papers referenced in the consultation paper indicates that some consumers have difficulty with calculations of nutrients and percentages. Also, the evidence does not give a clear preference for interpreting per serve or per 100g on food packaging. Therefore, providing only per 100g information in NIPs may make it difficult for some consumers to select appropriate serve sizes for consumption.

**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.**

DAA does not support the recommendation that per serving information be voluntary. Per serving information in the nutrition information panel should be mandatory regardless of whether a daily intake claim is made.

However, in the case that per serving information *is* made voluntary, the DAA supports the recommendation that the per serving recommendation be compulsory when a daily intake claim is made.

The purpose of a daily intake claim is to help people understand the contribution of a serving of food to their whole diet. However, if per serving information is not listed on packaging the daily intake claim is provided without context i.e. it would be difficult for many people to calculate the amount of the nutrient provided in one serve using the per 100g information.

The DAA position is based on the evidence presented in the FSANZ consultation document which suggests at least half of Australians use per serving information to choose foods, as listed below.

*Section 7.3 Consumer use and understanding of per serving information (pgs 13 – 14)*

“...the per serving column was viewed as providing information on the nutrient amounts that the person would actually consume.”<sup>3</sup>

“...Australian and New Zealand research participants were more likely to use the per serving information than the per 100g/100mL information (50% use compared to 39% use) (Scott et al. 1999).”

“Participants were more likely to use the per serving column both for making judgements about a single food and for comparing two foods.”<sup>4</sup>

“...when asked to choose the healthier product based on two snack food NIPs, where the serving size was the same, 54% reported that they mainly used the per serving column. Only 30% reported using the per 100g/100mL column.”<sup>5</sup>

DAA recommends further research is conducted in to the use of the serve size column in context of the Front-of Pack labelling (FoPL) scheme, including in conjunction with daily intake claims. It should also be considered that as the FoPL system is voluntary, not all products making daily intake claims will use the FoPL system.

- 4. 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?**

Yes, this would be a problem. DAA is concerned that introducing further variability in the format of the NIP across the food supply may cause consumer confusion.

One of the aims of food labelling, including the NIP, is to educate and inform consumers to make healthy food choices. A standardised NIP including compulsory per serve information would promote consistency for consumers within and across food categories. While consumers may not always follow the serve size recommendations, serve size information is important. It shows what a reference serving and therefore portion size is, and complements front of pack labelling devices such as the Health Star Rating, % DI and the Heart Foundation Tick which are aimed at helping consumers make better food choices in appropriate amounts.

- 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.**

Should the per serving information in the NIP be made voluntary, DAA considers it would be important to make the inclusion of per serving information in the NIP mandatory if a product makes a nutrition content claim regarding the presence of vitamins, minerals, protein, omega-3 fatty acids or dietary fibre. This would be justified by the current stipulations in Schedule 1 of standard 1.2.7 'conditions for nutrition content claims' which require per serving information to be included in the NIPs of products making nutrition content claims. For example to make a 'good source of fibre' claim, Schedule 1 of Standard 1.2.7 requires that a serving of the food contain at least 4 grams of dietary fibre.

In addition to regulatory issues, providing per serving information when a nutrition content claim is made provides an important opportunity for consumers to be educated about the amount of a food item that must be consumed to obtain the nutrient of interest in the advertised quantity.

**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**

If per serving nutritional information in the NIP was made voluntary, 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.<sup>6,7</sup>

Another example of where this information should continue to be mandatory is in relation to Standard 2.6.4 for Formulated Caffeinated Beverages (FCBs). Under this Standard, the caffeine limit for these products is set at a per litre level. This means the per serve information is the only method by which consumers can calculate how much caffeine these products provide in a serve, given the wide range of serving sizes available. This is a rapidly growing product category (179% annual growth in 2013) and given that the largest consumers of these products are teenagers and young adults,<sup>8</sup> the provision of per serve nutrition information in the NIP is also of particular relevance to the parents and carers of these consumers.

**7. What additional studies examine consumer use and understanding of per serving information in the nutrition information panel on food labels?**

A brief search of PubMed reveals the following articles which examine consumer use and understanding of nutrition information panels.

- Watson WL, Kelly B, Hector D, Hughes C, King L, Crawford J, Sergeant J, Chapman K. Can front-of-pack labelling schemes guide healthier food choices? Australian shopper's responses to seven labelling formats. *Appetite* 2014; **72**: 90-97
- Grunert KG, Wills JM, Fernandez-Celemin L. Nutrition knowledge and use and understanding of nutrition information on food labels among consumers in the UK. *Appetite*. 2010; **55**: 177-89.

**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 analysis of advantages and disadvantages of serving information in the NIP is problematic given the lack of consistency in serving information in the food industry.

### *Advantages*

- The absence of per serving declaration on NIP's would reduce the visual clutter on food labels.<sup>9</sup>
- Removal of the per serve column could potentially reduce consumer confusion due to different serve sizes used on different products within the same food category.
- May improve consumer ability to understand food labels and compare products if only one column of information was present.

### *Disadvantages*

- It is unlikely that the advantages would be realised where products still required per serving column due to the inclusion of %DI, %RDI or content claims.
- If the per serve column was voluntary, there is likely to be a mixture of food labels with and without the per serve column. Consumers may be confused by the varying presentation of information on labels.<sup>10-12</sup>
- If the per serve column became voluntary, and the result was a mixture of some foods having the per serve column, and others not, this would be an additional challenge for clinicians assisting their clients on how to interpret food labels to make healthier choices.
- It may discourage industry from working towards the development of standardised serve sizes.

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

No, DAA recommends the declaration of the amount of energy and nutrients per serving be mandatory for the following reasons:

a) A consistent approach in food labelling is needed to minimise potential consumer confusion. The consumer research outlined in the FSANZ Consultation Paper highlights the variation in consumer use of NIP information on a per 100g/100ml or per serve basis and does not provide clear evidence for preference or ease of use to identify the healthfulness of a product. If the declaration of nutrients per serving was made voluntary, consumers who prefer that labelling approach might find it more difficult to interpret NIPs.

b) Serving size information in the NIP provides consumer guidance on recommended serving sizes. This is particularly important in large multi-serves of foods and drinks e.g. 2L bottles of carbonated soft drinks or milk, large boxes of breakfast cereals etc. The serving size information in the NIP provides consumers with clear information on recommended serve size and nutrient content to ensure there is no confusion in

what the manufacturer is recommending e.g. advocating 250mL serve of fluid or  $\frac{3}{4}$  cup of breakfast cereal.

Along with DAA's recommendation for mandatory per serving nutrition information in the NIP, the development of standardised serving sizes for food labelling across all food categories is desirable. DAA notes that as of June 2014, there are two categories with agreed standard serving sizes: beverages and chocolate/sugar confectionery. The Consultation Paper states that this is currently being considered by the Government as an additional task of the Food and Health Dialogue which DAA strongly supports.



## References

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