

3 February 2015

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

To Whom It May Concern,

Diabetes New Zealand represents people living with diabetes. We have 20 Branches spread throughout New Zealand whose role is to support people to live well with their diabetes. Our members are people of all ages from all backgrounds and with all types of diabetes mellitus.

One of the key principles of good diabetes management involves diet and the development of knowledge about various foods and their nutrient levels. Food labels are imperative in both the acquisition and application of this knowledge and it would pose a serious handicap were the per-serving data to be removed. Given this knowledge can be needed to determine therapeutic management every time any food is eaten, retaining the per-serve data solely in the context of a per-daily intake requirement would serve no purpose in meeting the particular needs of our members.

People with type 1 diabetes are insulin-dependent and their diabetes is mostly managed using MDI (multiple daily insulin injections) or constant insulin infusion pump therapy. Both of these therapies require the administering of precise quantities of insulin every time any food is eaten. The amount of insulin required is determined by the nutrients (mostly carbohydrates) contained in the food, thus maintenance of good control of blood glucose levels is completely dependent on accurate nutrient knowledge and information. Food labelling is a vitally important component in this and people with diabetes are taught this as the most fundamental cornerstone of their self-management.

Arguably the nutrients per 100 mls/gms information could be regarded as sufficient to meet the requirements of the person with diabetes; however both columns of information are of great value and can serve different, but equally valuable purposes, hence the importance of their retention. Without a doubt measurements per serve enable easier comparison of nutrient content and value of food in single serve portions e.g. where servings are in 'units' such as numbers of crackers, slices of bread. Because people with diabetes are totalling the numbers of carbohydrates per meal or snack, it is far easier to count the value in 'units' of a food than it is to weigh and measure all of the time.

Nutrient value per serve makes it easier to calculate total carbohydrate value where foods are combined. Ease of use is important to enable everyone to access this data. Were it to be

solely supplied as per 100 mls/gms information, there would be many unable to use it simply because it does require a reasonable level of numeracy to use accurately.

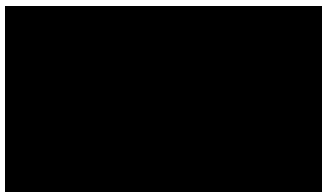
People with type 2 diabetes may have slightly different needs from food labelling data. Increasingly more of them are requiring insulin therapy to manage their blood glucose levels. If they are not at that stage in their treatment continuum they still require good information that enables them to make the right decisions re the food they eat, as healthier eating and education about it is a key part of their treatment. The per serving information indicates what a normal serving is, along with the sugar and fat it contains. In these circumstances the concept of 100gm (or mls) is difficult. It adds unnecessary complexity to what can be new and confusing dialogue which must be kept simple and accessible.

There are almost 250,000 people with diabetes in New Zealand (MoH data, 2013) with another 500,000 having pre-diabetes. This is a significant sector of the population who need reliable and accessible nutrient content data on the packaging of the food they buy.

Diabetes New Zealand advocates strongly for the retention of the per serve column information on food labels and that its inclusion remain compulsory. It is vitally important information to those in the sector group we represent who are trained in its use and use it daily in managing their health.

Indeed if we could change anything about food labels, we would require them to be bigger so they can be read more easily!

Yours sincerely,



Chris Baty  
National President.