

14th Feb 2015

Food Standards Australia New Zealand (FSANZ)

Boeing House

55 Blackall Street

BARTON ACT 2600

To whom it may concern,

RE: Labelling Review Recommendation 17 - Per serving declarations in the Nutrition Information Panel

Recommendation 17 states that the declaration in the Nutrition Information Panel (NIP) of amount of nutrients per serve be no longer mandatory unless a daily intake claim is made. Our view is that until standard serving sizes have been implemented within the different food categories, the NIP should remain as it is expressing data both per serving and per 100g/100mL. Please see below our responses to your specific questions.

Kind regards,



Research Fellow

On behalf of the Food Policy Division at the George Institute for Global Health



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Q1 How do you or your organisation use per serving information in the nutrition information panel on food labels?

The George Institute for Global Health (TGI) collects nutritional information from packaged foods that are available for sale throughout Australia. These data are used by TGI to populate a global branded food composition database of packaged foods, both to monitor the packaged food supply and to support the FoodSwitch smartphone application. In FoodSwitch the user/consumer is able view the manufacturer's suggested serving size if it is provided.

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.

We believe standardised per-serving information is useful across all food categories and food packages. We support the notion that all food packages, regardless of the number of serves per pack, display serving information and that the serving size is consistent across a food category. Studies have shown that larger portion sizes promote excessive caloric intake and obesity [1, 2] and information that can help to inform consumers about portion size is of value. We note that there is currently a wide variation in the declared serving sizes of similar packaged foods sold within the same category of foods [3-5]. For example, our own preliminary analysis, carried out in collaboration with the NSW Cancer Council, has shown that serving sizes vary substantially within and between snack food and confectionery categories. This is illustrated within the potato crisps category, with the same product having a serving size of 45g in an individual pack, 19g within a multipack, and 27g within a large pack (Watson, 2015, unpublished data). Interestingly, confectionery is one of the only food categories that has a standardised serving size (voluntary) [6].

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.

No. We believe it should be mandatory regardless of whether a daily intake claim is made. Studies suggest that both the NIP and the %DI labelling systems may be of value to consumers, although both may also be difficult to understand [7, 8]. We support the mandatory inclusion of per serving nutrient information on the NIP in conjunction with the standardisation of serving sizes – further, we suggest discretionary food categories as the starting point for standardisation. To this effect we suggest that government and industry work together to set standard serving sizes for packaged food and beverage items. This is also already an objective defined by the Food and Health Dialogue and is a sensible next step in the area of clearer food labelling and obesity prevention.

Q4. 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?

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Yes, we believe further variation in the presentation of the data would be a problem. It's already confusing enough for the average consumer. Any action which results in more variability on what is labelled on packaged food and beverage products is a problem. Given government and industry agreement to shift to HSR format front-of-pack labelling we recommend that the government disallow other forms of labelling such as %DI to minimise confusion. For the special case of products that are designed to be consumed with at least one other food but are sold in a dry/concentrated form (e.g. cake mixes) we support the provision of per 100g/mL nutrient values for the "as sold" product, per 100g/mL for the "as consumed" product and if a serving size is also presented, nutrient values per serve should be presented for the "as consumed" product.

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.

*Yes, although we do not believe per serving information should be voluntary. The Food Standards Australia New Zealand (FSANZ) Food Standards Code, Standard 1.2.7, explicitly states that in order for nutrient content claims to be made about vitamins, minerals, protein, omega-3 fatty acid and dietary fibre that the food product must contain a specified amount per serve of the food. For example, for a food product to obtain the content claim 'good source of fibre', a *serving* of the food product must contain at least 4g of dietary fibre [9]. Whether this is achieved is not explicit unless per serving data are presented.*

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

*Yes, although we do not believe per serving information should be voluntary. Any food covered by a regulation or standard which states the food must or must not contain a particular nutrient per serving should be included. In addition, foods for which per serving information should be mandatory include, single serve food items, formulated and supplemented meal replacements, foods for medical purposes and foods which have high level and general level health claims. The reasoning for this is that these particular food products have specific food standards defining what must/must not be included at the per serve level of food. One key example is formulated meal replacements. Food Standard 2.9.3 states that formulated meal replacements must contain *in a serving* no less than "12g protein, 850kJ and 25% of the RDI of each vitamin and mineral listed in column 1 of Table 1 in the Schedule" [10]. This type of food product has become more and more popular amongst consumers and it is essential that they are provided with information about how much of their required nutrients they are obtaining by eating a serve of that product.*

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 have no further studies to add to the ones cited in section 7 of the Labelling Review Recommendation 17 document.

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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.

We do not see an advantage to the use of per serving information being voluntary. Consumers eat a “serving” of a product and the information provide per 100g/mL of a product is not especially instructive in that regard. A significant problem with the per serving data is that consumers can be easily misled by manufacturers manipulating the serving size to make the product’s nutritional composition look better. The solution to this, however, is to mandate standard serving sizes, not to remove per serving data.

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

No.

ADDITIONAL NOTE

We are currently leading a study, in collaboration with the National Heart Foundation and the University of Sydney, to examine the relationship between portion sizes eaten by Australians (based on the ABS National Nutrition Survey), and the serving sizes recommended to Australians by the Dietary Guidelines and industry package labelling.

There is an urgent need for standardised and realistic labelling of serving sizes on food packaging in Australia, and these should be regulated in the same way that they are in the USA and Canada [11, 12]. Taking into consideration the timeline for implementation of changes in labelling and the need for valuable nutritional information to be included on the label, we believe the serving labelling should remain as it is, until regulated reference amounts for serving sizes are introduced.

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