



27 February 2015

Food Standards Australia New Zealand
By email submissions@foodstandards.gov.au

Dear Food Standards Australia New Zealand

Re: Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel

CHOICE appreciates the opportunity to provide the following comments to Food Standards Australia New Zealand (FSANZ) on Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel.

CHOICE is actively involved in public health and food labelling issues based on our commitment to consumer rights. We advocate for a food system that promotes the health of Australians, where consumers are able to make informed choice about the food they buy. In this instance, we firmly believe that no decision should be made regarding voluntary per serving declarations until consumer testing is conducted and shows a clear path to take.

With the ever increasing number of packaged food products available in Australian supermarkets, it is becoming more and more difficult for consumers to make healthy food choices. The Nutrition Information Panel (NIP), containing nutritional information per 100g/mL and per serving size is designed to provide consumers with in-depth information on a product's nutritional composition. However we suspect consumers find this information confusing and difficult to understand. Introducing a change to this key feature of every processed food would have broad effects and should not be considered unless any strong evidence points to a solution that would be in the best interest of consumers.

This decision should not be considered in a vacuum; any changes to the NIP should compliment the Health Star Rating (HSR) system. Furthermore we believe that there are higher priority issues with serving sizes than deciding whether they should be mandatory or not.

Any changes to the NIP should compliment the Health Star Rating system

To help consumers make healthier food choices, the front of pack labelling initiative, the HSR system, was introduced in 2014, using 100g/mL to rate a product's healthiness. The HSR system has been developed with considerable input from public health and industry groups in a government-led process and is based on extensive consumer research. This is what will deliver consumers with the information they need to make healthier decisions at a glance. Any proposed change should be developed with the objective to compliment the

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HSR system. Considering the time and investment spent on developing this front of pack initiative, we would not want any changes to the NIP to undermine the system or make it more difficult for consumers to use.

In the first instance, serving size inconsistencies need to be addressed


One of the biggest consumer issues with food products is flawed serving sizes. Serving sizes are often an unreliable source of information for consumers; they are inconsistent between comparable products and are not useful for anyone who does not fit the average intake requirements, such as children whose energy needs are significantly different to adults. The reality is that serving sizes are often so at odds with what people actually consume, to the extent that they are potentially misleading.

Again this is why we believe the proposed HSR system would be more helpful to consumers because the star ratings are based on 100g/mL of the product¹. This system would help consumers compare products at a glance and identify healthier options more easily.

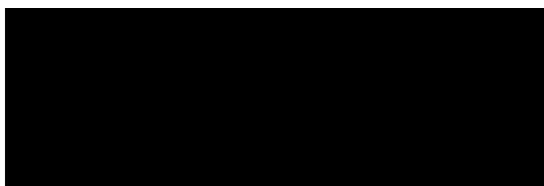
While we believe that nutritional information per 100g/mL is the best way for consumers to compare nutritional information, we do appreciate that many consumers use the per serving information. Per serving information can be useful when there is a discreet serving size, such as 1 piece of bread, 2 biscuits or single consumption packs such as beverages.

To allow for serving sizes to benefit a greater amount of people, we believe they should be standardised. This would prevent manipulation of serving sizes and ensure manufacturers provide serving size information that is a more accurate reflection of serves to avoid the need for consumers to make complicated calculations at point of sale.

In the absence of conclusive research on whether voluntary per serving declaration would be beneficial to consumers or not, we strongly recommend that consumer testing is conducted before any decision is made on this proposal.

For further information, please contact CHOICE 

Yours sincerely,



Policy & Campaigns Advisor

¹ Except for when a product is presented in single serve packages, multipacks or products for which an industry agreed standardised portion size applies.

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