

Submission

Consultation Paper - Labelling Review Recommendation 17: Per serving declaration in the nutrition information panel

Comments from the Department of Health and Human Services, Tasmania,
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The Department of Health and Human Services, Tasmania (the Department) appreciates the opportunity to comment on the Consultation Paper - Labelling Review Recommendation 17: Per serving declaration in the nutrition information panel. This submission will address a number of the questions raised in the discussion paper.

Question 1 – How do you or your organisation use per serving information in the nutrition information panel on food labels.

The Department uses the per serve column on the NIP's in all the ways identified within section 3 of the Consultation paper.

In public health nutrition in Tasmania the per serve column is used as part of our canteen accreditation program. This program is based on the *National Healthy School Canteen* guidelines (1) which require canteen managers to classify foods as amber or red according to the nutrient criteria per serve for snack foods and per 100g for other foods. If the per serve column was voluntary it would make it very difficult for canteen managers to assess products based on the current guidelines.

In the clinical setting, dietitians use both the per serve column and the per 100g column in educating consumers about their specific dietary requirements. This information can be obtained from the per 100g column but it requires a certain level of numeracy skills that many in the community don't have.

Using the per serve information under the current regulations where there are no set serving sizes does make it difficult for consumers to compare similar products. It is only useful if the serving size is practical, realistic and the same for a specific product category.

The Department recommends investigation into the feasibility of standard serve sizes to enable consumers to make more meaningful comparisons and having the serving size information provided in common household units (and in grams/ml). This would reduce the variability of how products are labelled thus reducing consumer confusion (2).

Question 2 – Are there any particular food categories or types of foods packaged (e.g. single serve packages) for which per serving information is particularly useful? If so what are they? Explain why the information is useful.

The per serve information is used widely in Tasmania as part of the canteen accreditation program that utilises the *national healthy school canteen (NHSC)* guidelines. The per serve information is used to assess products such as sweet and savoury snacks, ice cream, milk based ices and dairy desserts, cakes, muffins and sweet pastries to determine the suitability in the school canteen setting. If the per serve column was voluntary on products, revision of the NHSC guidelines would be needed.

Question 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.

The Department does not support this recommendation to make per serving voluntary unless a daily intake claim is made.

An important component of the current regulations is consistency in format with all products requiring per serve and per 100g information. Whilst it is acknowledged there are some products that have additional information such as %DI labelling and an option of a third column for foods intended to be consumed with another food, adding another level of variability may lead to further consumer confusion.

The Australian Food and Grocery Council reports that the Daily Intake Guide now appears on over 7200 packages (3). Therefore there are a large number of foods that would still need to include per serve information within the NIP.

Research highlights that consumers read labels more accurately if they are familiar with the label format (4). If the format changes from products within the same category of foods this could be more confusing for consumers.

Question 4. 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 on 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?

As highlighted in Q3 more variability in the NIP lends itself to greater confusion by consumers.

Question 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 you answers.

If per serving was voluntary it should be made mandatory when a nutrition content claim is made about vitamins, minerals, protein, omega – 3 fatty acids and dietary fibre as outlined in Schedule 1 of Standard 1.2.7.

This would benefit both consumers and regulators and ensure transparency with manufactures.

However, this information has limited value for consumers if there are no standardised serve sizes across food categories.

Question 6. If the 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 situations? Explain your answer.

Per serving information should be mandated in Standard 2.6.4 Formulated Caffeinated Beverages and foods included in Part 2.9 Special Purpose Foods, specifically Standard 2.9.3 Formulated Meal Replacements and Formulated Supplementary Foods; and, Standards 2.9.4 Formulated Supplementary Sports Foods. Most of these foods are supplied /consumed in a per serve basis which enables consumers, dietitians and regulators to easily identify nutrition information per serving.

Question 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 Department does not see any advantages in per serving information being voluntary.

In relation to disadvantages the Department believes there is the potential for further consumer confusion due to inconsistency in NIP format between products. It also lends itself to confusion for food manufactures making it more likely to inadvertently breach the relevant standards.

To assist consumers to make more informed choices it is more important to address the issue of standardised serve sizes rather than if per serving should be voluntary or mandatory. In addition if per serving does remain mandatory consideration should be given to assist consumers in making sense of this information by mandating serve size information in common household units not just in grams/mls.

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

Please give reasons and evidence to support your view.

If you are UNCERTAIN please indicate what information you would need in order to for a view.

The Department does not support the voluntary declaration of energy and nutrients per serving in the NIP. The Department suggests that consideration be given to investigate:

- Consumers understanding and use of per serve information, and how this influences their own portion control. This should include with and without standardised serves and the use of common household units to measure serve sizes.

References

1. Department of Health and ageing (2010). National Healthy School Canteen guidelines
<http://www.health.gov.au/internet/main/publishing.nsf/Content/phd-nutrition-canteens>
Accessed 9 February 2015.
2. Vartanian L, Sokol N (2012) Serving size information on nutrition labels in Australia. Australian and New Zealand Journal of Public Health, vol 36, no.5 pp.493-494.
3. The Australian Food and Grocery Council. Daily intake labelling.
<http://www.afgc.org.au/key-projects/daily-intake-labelling/> Accessed 9 February 2015
4. Cowburn, G & Stockley, L 2005. Consumer understanding and use of nutrition labelling: a systematic review. Public Health Nutrition, vol. 8, no.1. pp. 21-28.