

Labelling review recommendation 17 - Per serving declarations in the nutrition information panel

Submission from Diabetes Australia – Vic and Diabetes WA Dietitians

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Summary

Diabetes Australia (Vic and WA) dietitians do not support recommendation 17, that the declaration in the nutrition information panel of amount of nutrients per serve be no longer mandatory unless a daily intake claim is made.

We recommend that the inclusion of per serving information in the NIP should remain mandatory due to the range of applications for consumers of this information, particularly for those with diabetes.

Response to questions for submitters

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

Diabetes Australia – Vic (DA–Vic) and Diabetes WA (DWA) dietitians use per serving information in the nutrition information panel (NIP) for a range of educational purposes. These include teaching consumers how to assess their nutrient consumption in a particular meal and/or across the day. Per serve information is also used to compare the nutrient composition of different food products, where the serving size is comparable. This education is provided through our various consumer programs, including our supermarket tours.

Per serve information is also used to teach consumers with diabetes and health professionals how to assess the carbohydrate content of a food they are eating. Carbohydrate is the main nutrient to impact on blood glucose levels, so many consumers with diabetes count the carbohydrate in the foods they eat to ensure a balance of carbohydrate throughout the day, and/or to help determine how much insulin to inject for a meal or snack. By using the carbohydrate per serve of a food (rather than per 100g), consumers can often easily determine their carbohydrate intake without having to weigh their portion and then calculate the grams of carbohydrate.

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?

Per serving information is particularly useful on the following types of foods:

- **Single serve packages (e.g. muesli bars)**
Single serve packages are a defined portion, so including per serve information shows consumers the quantity of nutrients that they will actually eat. It also allows direct comparison with a single portion of another brand of the same type of product. For people with diabetes, per serve information on single serve packages tells them the amount of carbohydrate they will eat if they have one portion of the food (without having to calculate this themselves).
- **Foods that are portioned by the consumer (e.g. large tray of frozen lasagne; breakfast cereal)**
For these types of foods, the per serve information is useful for meal planning as this provides some guidance as to how many people the product serves, and also some guidance on a reasonable serving size. Again, per serving information can be used by people with diabetes for carbohydrate counting.
- **Products that are portioned by the manufacturer, but contain multiple serves per package (e.g. sliced loaf of bread, block of chocolate)**

Consumers eat these types of foods only in the pre-determined serves the manufacturer has portioned. Per serve information then is useful for these foods as it tells consumers what quantity of nutrients they will consume if they are eating one of these serves – e.g. one slice of bread, one square of chocolate.

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.

Should the recommendation be approved, we support the approach that per serving information should be mandatory if a daily intake claim is made. References to %DI or %RDI are meaningless without reference to how much of a given food a consumer would need to eat to achieve this. Providing the nutrients per serve also provides some education for consumers on their nutrient requirements across the day – i.e. if one serve of this product contains 50% of the RDI, then 2 serves would meet 100% of requirements for the day.

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?

More variability in the format of the NIPs would definitely be a problem – it is recognised that many consumers have difficulty interpreting these in their current standardised format. Further variability can only increase this confusion and reduce consumer confidence in interpreting the NIP.

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?

Per serving information should be mandatory when a nutrition content claim is made about the specific nutrients. For a product to make a nutrition content claim, the food often must contain a certain amount of that nutrient per serve, so it is important that the food label then clearly displays what a serving of this food is, and how much of that nutrient the serve provides.

If the claim is made based on a percentage nutrient claim, then perhaps the amount per serve is less relevant. However without including the per serve information, this leaves open the possibility of misuse of these claims, where a product may have a high percentage of 'x' nutrient, but may commonly be consumed in such small serving sizes that the percentage nutrient content becomes irrelevant.

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?

Mandatory inclusion of per serving information should be considered in the situations that are considered to be particularly useful – as discussed in our response to question 2.

Q7. What additional studies examine consumer use and understanding of per serving information in the nutrition information panel on food labels?

Research studies investigating this specific question are limited, and further research in this area would be very useful for informing any future changes to the NIP.

A brief search did not turn up studies additional to those cited in the Labelling Logic report.

Q8. From your perspective, what are the advantages and disadvantages of per serving information in the nutrition information panel being voluntary?

Advantages

- For those products that choose not to include the per serve information, there would be less information on the label, and only one column for the consumer to interpret

Disadvantages

- Potential for increased variability between labels if some were to retain the per serve information – this could introduce further confusion, and make it more difficult to teach consumers and health professionals how to use the NIP. Consumers would need to learn how to interpret NIPs with and without per serving information, and then tailor this to what they are eating

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. It is the position of DA–Vic and DWA dietitians that the declaration of the amount of energy and nutrients per serving in the NIP should remain mandatory for these reasons:

- Per serving information is essential in a number of situations (e.g. when a dietary claim is made) – so if it were to be made voluntary some labels would need to retain per serving information, hence introducing further variability in the NIP. Many consumers have difficulty interpreting NIPs and having different formats/contents for different foods has the potential to worsen this difficulty and reduce consumer confidence in using food labels
- For people with diabetes, per serving information is often crucial for monitoring carbohydrate intake, and/or carbohydrate counting to inform insulin dosing. Removal of this information will increase the burden of managing this already highly demanding condition
- Removal of per serving information also has the potential to increase the burden of other consumers needing to monitor nutrient intake for specific reasons such as certain medical conditions, or athletes trying to achieve certain intake targets

- Per serving information provides a valuable reference to what is a reasonable portion of a food to consume. This information is particularly useful where the NIP includes the serving size in both grams and in a common household measure.

Further research into the use and understanding of per serving information across a range of consumer groups would be very useful in informing future changes to the NIP.

Per serving information could also be made more useful to consumers if there was consistency in serving sizes across food categories and types, and if it was mandatory to include a common household measure or 'real world' interpretation of the serving size on the label.

References:

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