



Human Genetics Society of Australasia

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AUSTRALASIAN SOCIETY FOR INBORN ERRORS OF METABOLISM (ASIEM) Special Interest Group ABN No. 17 076 130 937 002

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

Thank you for the opportunity to comment on the Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel (NIP) and Recommendation 17 states: *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.*

This submission has been completed on behalf of the Australasian Society for Inborn Errors of Metabolism (ASIEM) metabolic dietitians with dietetic representation from all states of Australia and New Zealand.

Metabolic dietitians are responsible for the nutrition management of infants, children and adults who have been diagnosed with an Inborn Error of Metabolism (IEM). These are rare diseases individually but encompass a considerable number of different disorders covering protein, fat and carbohydrate metabolism. The degree of restriction is often severe, for instance in the protein metabolism disorders such as phenylketonuria(PKU), requiring the patient to eat no meat, fish, poultry, eggs, dairy foods, nuts and legumes and consume only a very limited amount of cereal based foods. Failure to do so can result in severe neurological and developmental consequences and in some disorders, death. For many with an IEM the severe diet restriction is lifelong.

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

- Metabolic dietitians teach consumers to use the NIP per serve information to manage their restrictive diet and making day to day food choices, greatly increasing variety and ability to comply with diets. The very reason metabolic dietitians use the per serve column is as the background paper states that per serving labelling uses include (pg5)
*“to facilitate easy comparison of the energy and nutrient content of foods in single serve portions
to provide information for health professionals when guiding clients with special dietary requirements e.g. salt intake (noting that such information could be calculated using the values in the per 100g/100 mL column)”*

CHAIRPERSON: [REDACTED]
SECRETARY [REDACTED]
TREASURER [REDACTED]

- The per serve information on the NIP allows *on the run* assessment of intake and it is likely that compliance to dietary prescription would be reduced if the serve size values were **not** included due to the need to do more complicated maths when consuming a serving of the food. This is likely to be challenging for those with less numerical skills and for those in a hurry. An error in calculation can result in over or under consumption of the restricted nutrient resulting in elevated metabolites which can have medical consequences and at worst admission to hospital with a metabolic crisis for some IEM conditions
- ASIEM dietitians acknowledge that 100g/100ml labelling is useful for comparison of products and indeed teach our families to use it for this purpose but 100g/100ml does not give the consumer any idea of what would be considered a reasonable serving size. Consumers usually related food in serving sizes not per 100g/100ml and few consumers would have the whereby means to determine if 100g/100ml of a product was a serve size, an oversized or small serve.
- Most ASIEM dietitians have had experience with the inadequacies of the USA labelling system for our patients using imported foods, when a small serve size is inappropriate and per 100g/100ml is not provided.

ASIEM dietitians consider the FSANZ system to be superior for teaching and managing the specialised restrictive diets our patients must adhere to for treatment of their inborn error of metabolism.

Q2: Are there any particular food categories or types of food packages for which per serving information is particularly useful? If so what are they? Explain why the information is useful.

- ASIEM dietitians prefer and strongly recommend per serve information be retained on all NIP.
- ASIEM dietitians believe FSANZ is being discriminatory in that it is felt to be important information for those foods containing caffeine or making daily intake claims, it is not seen to be important for those consumers who for the sake of normal healthy development of their children or themselves, are required to accurately assess or calculate the intake of the foods they consume daily.

The review of research acknowledges that (pg 13-14 Consultation Paper):

"People who reported having nutrient restrictions for health and/or religious reasons viewed the NIP as very important (NFO Donovan Research 2001)" and "The research concluded that although participants were divided in their preferences for information to be presented per 100g (%) or per serving, the overall preference tended to be for 100g as this was viewed as easier to work with. Nonetheless, having both was viewed as an acceptable format and of value in different circumstances (p.34). In particular, the per serving column was viewed as providing information on the nutrient amounts that the person would actually consume."

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 the %DI labeling and the option to include a third column for foods intended to be prepared or consumed within at least one other food. If per serving information in the NIP was voluntary this would results in more variability in the format of NIP across the food supply. Do you think this would be a problem?

- ASIEM dietitians acknowledge it is important that NIPs are kept as clear as possible to avoid misinterpretation of information by consumers. The NIP needs to be consistent in both information provided and lay out.

Q5: If per serving information in the nutrition information panel was voluntary, do you think the inclusion of per serving information panel should be mandatory when a nutrition content claim about vitamins, minerals, protein, omega 3 or dietary fibre is made?

- ASIEM dietitians support per serving information be mandatory when a nutrition content claim is made.
- ASIEM dietitians do not support per serving information being voluntary we support it being mandatory whether a nutrition claim has been made or not by the manufacturer.
- Refer to response to Q2

Q6: If per serving information in the NIP was voluntary, do you think the inclusion of per serving information on the NIP should be mandatory in any other specific regulatory situations?

- ASIEM dietitians do not support per serving information being voluntary we support it being mandatory across all NIP.
- Refer to response to Q2

Q8: From your perspective, what are the advantages and disadvantages of per serving information in the NIP being voluntary? Please provide evidence where possible.

Disadvantages to per serve information being voluntary:

- Per serve gives a guide as to amount of food considered to be a single serve.
- People cannot visualize what 100g of food/product looks like.
- There is a significant group of people in Australia and NZ with medically prescribed diets who use the per serve information on NIP on a daily basis when making food choices.
- For people with some types of IEM an error in calculation can result in over or under consumption of the restricted nutrient resulting in elevated metabolites which can have medical consequences and at worst admission to hospital with a metabolic crisis.
- Refer to response Q1

Q9: 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 evidence and reason to support your view. If you are UNCERTAIN please indicate what further information you would need.

- No, refer to response in Q1

In New Zealand and Australia we have been in a privileged position to have both 100g/100ml and per serve data on NIP. This information has enabled consumers to make more informed choices about food.

ASIEM dietitian's support per serve information on NIP be mandatory and not voluntary.

[REDACTED]
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ASIEM Dietetic Representative
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