FOOD STANDARDS
Australia • New Zealand
Te Mana Kounga Kai - Ahitereiria me Aotearoa

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Preliminary position paper

Nutrition information panel review

Food Standards Australia New Zealand (FSANZ) is undertaking a review of the nutrition information panel (NIP) to determine whether regulatory changes to the Australia New Zealand Food Standards Code (the Code) are warranted to better support consumers to make informed food choices.

FSANZ's preliminary position is that the NIP continues to meet its intended purpose and no regulatory changes to the Code are necessary at this time.

FSANZ has carefully considered previous work on nutrition labelling, relevant ministerial policy guidelines, Australian and New Zealand dietary guidelines, overseas and international regulations, new and existing consumer research, estimated costs of label changes and stakeholder views.

Three themes emerged through the NIP review that required exploration in greater depth. They represented key areas of current Code requirements where questions commonly arise. These were the provision of nutrition information in online sales, the prescribed format of the NIP, and per serving information.

Overall, the evidence supports that the current NIP requirements remain effective in achieving their intended purpose. The NIP continues to be a valued and trusted source of nutrition information for consumers. However, FSANZ recognises that factors such as legibility, format consistency, serving size presentation and technical terminology can affect consumer understanding and usability.

FSANZ welcomes stakeholder feedback on our preliminary position and invites additional information or perspectives that may assist in refining our approach before development of final recommendations to food ministers in early 2026.

The survey response form in FSANZ's Consultation Hub allows you to submit a response to this paper. FSANZ also accepts submissions in hard copy to our Australia and/or New Zealand offices. Submissions close at 11:59 pm (AEDT) on the 30th of November 2025.

Contents

Introduction

Food Standards Australia New Zealand (FSANZ) is examining consumer use and understanding of the nutrition information panel (NIP) to assess whether regulatory changes to the Australia New Zealand Food Standards Code (the Code) are warranted to better support consumers to make informed food choices in line with dietary guidance.

This paper provides an overview of the scope, methodological approach, evidence considered to date and current findings. It explains how the evidence has informed FSANZ's preliminary position, which is that the current NIP requirements in the Code remain effective in achieving their intended purpose and no regulatory changes are warranted at this time.

FSANZ welcomes stakeholder feedback on our preliminary position and invites additional information or perspectives that may inform our final recommendations to food ministers in early 2026.

Background

The NIP was mandated in the Australia New Zealand Food Standards Code to provide consistent, meaningful and accurate information about the nutritional content of foods, reflecting national policies for public health and nutrition. The NIP provides numeric information about the quantity of nutrients and energy in food to enable consumers to compare and select foods in-line with dietary recommendations.

This review considers whether the NIP continues to meet its intended purpose given changes in the policy environment, food supply and population over the past 25 years and whether any regulatory change is required.

The review has been conducted in parallel with preparatory work for potential mandating of the Health Star Rating (HSR) system, should the final uptake target (70% of intended products by 14 November 2025) not be met. This concurrent work provides a valuable opportunity to consider the relationship between front-of-pack (HSR) and back-of-pack (NIP) nutrition labelling in supporting consumers to make healthier and informed food choices.

Previous reviews of nutrition labelling

FSANZ's review of the nutrition information panel builds on previous work to strengthen nutrition labelling. A 1999 review, *Proposal P167 – Review of nutrition labelling*, established the foundation for mandating the NIP in the joint Code based on consumer evidence that a consistent prescribed format supported consumer understanding and use.

In 2009, food ministers agreed to a comprehensive independent review of food labelling law and policy. Conducted by an independent expert panel, the findings of the review were published in 2011, in the report *Labelling Logic: Review of Food Labelling Law and Policy*. In December 2011, food ministers agreed on a response to the recommendations contained in the review. As part of this government response, FSANZ undertook an analysis of several recommendations in the report, and commissioned a literature review to inform that analysis.

Scope

This review focuses on the information required in the NIP, how it is presented and whether it continues to support consumers to make informed food choices. Specifically, the review examined:

- the prescribed format (the design and layout of the NIP, including order of nutrients)

- per serving information
- percentage daily intake (%DI) and percentage recommended dietary intake (%RDI) information
- included nutrients
- terminology used for nutrient declarations
- expressions for declaring average quantity (i.e. units of measurement)

The role of the NIP in supporting other labelling elements, such as nutrition content and health claims and the HSR system, was also considered.

Out of scope were requirements for when a NIP must be displayed, nutrient reference values (as these are being reviewed under Proposal P1047), legibility (as this is a broader issue across the Code) and nutrition information specific to certain foods (e.g. calcium in chewing gum or infant foods).

Inclusion of interpretive labelling elements (e.g. high/low nutrient descriptors) in the NIP were also out of scope, as the HSR system is intended to provide an interpretative summary of nutrition information. If the HSR system is not mandated, FSANZ may consider whether the NIP could better support consumers to make healthy food choices in the absence of a front-of-pack scheme.

Our approach

FSANZ conducted a series of technical assessments on the issues within scope of the review. These assessments considered previous work on nutrition labelling, relevant ministerial policy guidelines and Australian and New Zealand dietary guidelines, dietary consumption surveys, overseas and international regulations, new and existing consumer research, estimated costs of label changes and stakeholder views.

The evidence base provided a contemporary understanding of how the NIP is used, understood and applied across the food system, supporting FSANZ in determining if Code requirements remain effective and proportionate to their intended purpose.

Stakeholder views

A public call for information ran from 22 November 2024 for eight weeks to gather evidence and perspectives from stakeholders on both the NIP review and preparatory work for potential mandating of the HSR system. FSANZ subsequently published a *What we heard* report summarising key themes, which have been used to inform this paper and FSANZ's ongoing analysis.

Ministerial policy guidance and dietary guidelines

In 2020, the then Australia and New Zealand Ministerial Forum on Food Regulation introduced the *Policy Guideline on Food Labelling to Support Consumers to Make Informed Healthy Food Choices*. This guideline establishes that food labels should provide adequate information to enable consumers to identify foods that do and do not contribute to healthy dietary patterns recommended in dietary guidelines.

Accordingly, FSANZ's work on the NIP review has had regard to this policy guideline and both the *Australian Dietary Guidelines* and the *New Zealand Eating and Activity Guidelines*, which were developed for health professionals, policy makers and others who support consumers to select and consume healthy diets. They were written for the general population, including those with common health conditions.

The dietary guidelines in both Australia and New Zealand emphasise matching energy consumption to individual needs, consuming a wide variety of nutritious foods, and limiting intakes of specified nutrients (saturated fats, added salt and sugar, and alcohol).

Nutrient reference values and dietary consumption surveys

The *Nutrient Reference Values for Australia and New Zealand* (NRVs) provide scientific recommendations for nutrient intakes and were used to assess whether population intakes are adequate. FSANZ drew on national dietary surveys, including the *2011-12 Australian Health Survey* and the *2008-09 New Zealand Adult Nutrition Survey* to determine general population nutrient intakes relative to the NRVs.

Overseas regulations and international guidelines

FSANZ compared the requirements for nutrition information in four jurisdictions, the United States of America, Canada, Europe, and the United Kingdom, with those in Australia and New Zealand. These jurisdictions were selected because they share similar demographic characteristics, regulatory objectives and standards setting processes, and routinely provide nutrition information in English.

FSANZ also reviewed international guidelines and standards, including the *Codex General Standard for the Labelling of Pre-Packaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985).

Consumer research

FSANZ reviewed 15 systematic and narrative reviews to explore potential issues with nutrition panels and evidence gaps. This was supplemented by a rapid review of 15 Australian and New Zealand publications, including submissions received through the 2024 call for information. Review of individual studies was limited to local research due to the substantial differences in nutrition panels internationally. The search terms and identified references for both reviews are listed in Appendix **B**.

Recognising the limited amount of contemporary domestic research, FSANZ commissioned ten focus groups across Australia and New Zealand to explore consumer use, understanding and perceived value of the NIP. Seven groups, comprising people from low socio-economic backgrounds, high NIP users and the general population, have been completed. External ethics approval is being sought for additional groups involving Aboriginal and/or Torres Strait Islander Peoples, Māori and Pacific Peoples, to ensure the research has been appropriately designed for these groups.

Insights from these focus groups informed analysis of how and why consumers use the NIP, barriers to use and how consumers interpret the NIP alongside the HSR.

The focus group research was supported through a module in FSANZ's 2025 *Consumer Insights Tracker* (CIT), an annual survey of over 1200 Australian and 800 New Zealand consumers. This survey tested how qualitative insights from the focus groups translate to the broader population.

Costs

Recognising that the NIP is a mandatory element of most packaged foods, FSANZ considered the potential regulatory and business costs that could arise from any change to NIP requirements. FSANZ currently estimates there to be around 50,000 food and non-alcoholic stock-keeping units (SKUs) across the Australian and New Zealand food supply

that could potentially be impacted depending on the nature of a proposed change to the NIP. These potential impacts were considered alongside the likely public health and consumer benefits to ensure any future regulatory action remains proportionate.

What we have found so far

Consumer evidence

The NIP remains a valued and trusted source of information that consumers use to make informed food choices. FSANZ's 2025 CIT found that more than three-quarters of consumers regard the NIP as both trusted and important to their food choices, with 8 in 10 reporting they use it at least sometimes.

Consumers typically use the NIP in-line with its intended purpose. It is most frequently consulted when assessing unfamiliar products, comparing similar foods, checking nutrient levels and verifying on-pack claims. The NIP is used less often for familiar or indulgent foods.

Preliminary evidence also indicates that consumers use the NIP and the HSR system in complementary ways when both are available on pack. Consistent with their respective purposes, the HSR acts as a quick visual cue to the nutritional profile of a food, while the NIP is consulted for more detail. Consumers who are more health conscious are more likely to use and value both elements.

Nearly 9 in 10 consumers report having moderate or high knowledge of the NIP. However, several barriers to effective use were identified, including difficulties in physically reading the panel, inconsistent information across products, the use of technical language and abstract measures (e.g. grams), limited personal relevance and time pressures. Limited nutritional literacy also remains a key barrier. Specific elements of the NIP, such as percentage daily intake (%DI) and 'per serving' information, were found to be more challenging for consumers to interpret and apply.

Identified issues and preliminary responses

FSANZ undertook technical assessments on the six elements within scope of the review: prescribed format, per serving information, %DI and %RDI, included nutrients, terminology, and expressions for declaring average quantities. Three additional issues were identified through stakeholder feedback and consumer research: numeric information, legibility and online sales. **Table 1** in Appendix **A** summarises the issues raised and FSANZ's preliminary findings.

Three themes emerged through the NIP review that required exploration in greater depth. They represented key areas of current Code requirements where questions commonly arise:

- provision of nutrition information in online sales (described in more detail below)
- prescribed format (discussed in detail in Appendix **C**)
- per serving information (discussed in detail in Appendix **D**).

Overall, FSANZ's preliminary findings indicate that the current NIP requirements remain effective in achieving their intended purpose. Accordingly, FSANZ's preliminary position is that no regulatory changes are warranted at this time.

Provision of nutrition information in online sales

Access to accurate and complete nutrition information in online sales environments has been a recurring theme throughout the NIP review. Preliminary evidence suggests that consumers are not always provided with the full range of mandatory on-pack information when

purchasing food online. This gap has the potential to affect consumers' ability to make informed choices, particularly for new or reformulated products.

While the NIP is a central source of nutrition information, the issue of how mandatory labelling requirements apply in online settings extends beyond the NIP and into the broader digital retail environment. FSANZ recognises that ensuring consistent access to this information online is an important component of supporting informed consumer choice.

This matter is currently being considered across the food regulation system. The Food Regulation Standing Committee's policy paper *Information for Food Sold Online: Understanding and Defining the Problem* examines how mandatory labelling information is currently presented in online retail settings, identifies gaps and inconsistencies and explores options to improve consumer access to required information.

Providing a response to this position paper

The purpose of this paper is to share FSANZ's preliminary position, the evidence considered to date and the method used to assess whether regulatory changes to the NIP are warranted. FSANZ welcomes additional information or evidence that may assist in refining our analysis before finalising recommendations for consideration by food ministers.

Submissions can be made through the survey response form on FSANZ's Consultation Hub. FSANZ also accepts submissions in hard copy to our Australian or New Zealand offices. There is no need to send an email or hard copy if you have already submitted through the Consultation Hub.

About confidential information

A summary of what we heard will be published once responses close. We will not publish material that we accept as confidential.

Under section 114 of the *Food Standards Australia New Zealand Act 1991*, some information provided to FSANZ cannot be disclosed. We are required to treat information as confidential if it identifies trade secrets relating to food and any other information relating to food, the commercial value of which would be or could reasonably be expected to be destroyed or diminished by disclosure.

In the 'Confidential Information' section, you will be asked if you have any confidential information you wish to provide. Note that you can request that any part of your response be considered confidential, and you must provide justification for why the information meets the criteria for confidential information.

If FSANZ does not agree that the information you have requested to be confidential meets the criteria for confidential information, you will be given an opportunity to withdraw your response. Please note, confidential information in responses may be subject to release under the provisions of the *Freedom of Information Act 1982*.

Consent to collect personal information

Personal details will not be published (e.g. individual names, direct phone numbers, personal email addresses or addresses of private individuals). For information on how FSANZ manages personal information when you provide your response, see FSANZ's Privacy Policy.

DEADLINE FOR RESPONSES: 11:59 pm (AEDT) 30 November 2025

Responses received after this date will not be considered unless an extension is granted before the closing date. Extensions will only be granted due to extraordinary circumstances during the response period.

Any agreed extension will be notified on the FSANZ website and will apply to all submitters. Questions about making a response can be sent to standards.management@foodstandards.gov.au.

Responses in hard copy may be sent to the following addresses:

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Appendix A. Issues raised and preliminary responses

Table 1. Summary of issues raised and preliminary responses

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Prescribed format The design and layout of the NIP, including tabular format, columns and headings, and the order and grouping of nutrients.	The NIP's prescribed format is a potential barrier to international trade. Sub-groupings of nutrients (e.g. '- sugars' as a sub-group of 'carbohydrate') are poorly understood by consumers. Inconsistencies across NIPs (e.g. due to voluntary declarations or %DI information) are confusing to consumers.	During FSANZ's *Proposal P167 – Review of nutrition labelling*, consumer research found that a consistent format for nutrition information was essential to enable consumer use and understanding of the information. A literature review undertaken in response to the 2011 Labelling Logic report found that table format and consistent format and terminology assist consumers to find and use nutritional information. Both the focus groups and literature review found that a consistent NIP format supports consumer understanding, easy comparisons and trust in the food system. The literature review found that poor layout is a barrier to use and comprehension, while tabular formats assist with quick access to information. Some focus group participants find the NIP too detailed and time consuming to use in a supermarket setting. Others find the format simple, clear and familiar, and some appreciated extra detail (e.g. additional nutrient declarations). Some focus group participants felt inconsistent information (e.g. %DI or other voluntary declarations) makes it more difficult to compare products and sometimes reduces trust in the label.	See **Appendix C** for a detailed discussion of this issue.

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Per serving information This includes: • servings per package statement • serving size statement • quantity per serving column	Inconsistent serving sizes across similar types of products may be confusing for consumers and undermine informed choice. Serving size provides important context for consumers. Serving sizes should either be standardised or informed by guidance.	Focus group participants found this information valuable for tracking nutrient intake, guiding portion sizing, and understanding how many people a package will serve. The CIT, focus groups, and literature review found that inconsistent serving sizes for the same type of product can result in incorrect product comparisons, and that consumers are more prone to error when interpreting per serving information (vs per 100 g/mL). The literature review and focus groups found serving sizes that do not align with actual consumption may be confusing, perceived as unrealistic, and undermine trust. Focus group participants found it difficult to visualise serving size information in grams/millilitres, finding standardised contextual cues (e.g. cups, teaspoons) helpful. Servings in decimals are perceived as unhelpful.	See Appendix D for a detailed discussion of this issue.

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Percentage Daily Intake (%DI) and Percentage Recommended Dietary Intake (%RDI) information Additional contextual information that can be voluntarily provided in the NIP as a separate column.	%DI and %RDI provide important context for consumers but are inconsistently provided. %DI should be retained and strengthened, including with updated nutrient reference values. %DI and %RDI should be removed due to consumer confusion.	During FSANZ's *Proposal P167 – Review of nutrition labelling*, consumer testing found the NIP format that included %DI information (as well as per serve and per 100g) performed best on single food tasks. Many focus group participants saw %DI values as complex and not personally relevant (as they are based on an 'average adult diet'). Percentage format and being based on serving sizes contributed to this confusion. However, the focus groups and literature review also found %DI was valuable as a rough guide to interpret nutrient content values for some consumers.	%DI and %RDI were permitted in the NIP as a means of providing contextual information to consumers about nutrient content in a serving of food. In line with this purpose, %DI provided some focus group participants with useful contextual information to interpret nutrient content values, even if they did not perceive it as directly personally relevant. Consumers who did not understand or value this information typically ignored it. While the presence of %DI may increase the visual complexity of the NIP, there was no evidence that it inhibited informed food choices. Given this information is voluntary in the NIP (unless required to support nutrient content or health claims), does not inhibit informed food choices, and can provide valuable information to some consumers; there is insufficient justification for regulatory change.

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Included nutrients The specific nutrients that are required to be declared in the NIP. Current mandatory declarations are: energy, protein, carbohydrate, sugars, fat, saturated fatty acids, and sodium.	NIP lacks sufficient mandatory declarations, particularly added sugars, dietary fibre, trans fats, and cholesterol. Additional declarations in the NIP would incur substantial costs and may not be understood by consumers.	Nutrient declarations were reviewed against nutrient reference values, national dietary guidance and dietary consumption surveys to determine if the current regulatory requirements remain fit for purpose and enable the general population to make informed choices in line with dietary guidelines. Three categories of nutrients were assessed: nutrients currently mandated in the NIP; nutrients of public health concern (dietary fibre, trans fatty acids, calcium, iron, and potassium); and nutrients that may have inadequate intake among subgroups of the Australian and New Zealand populations (magnesium, zinc, vitamin B_6, and selenium). Added sugars was also considered as a subcategory of sugars. Few focus group participants raised a desire for additional nutrient declarations.	Nutrients are mandated for declaration in the NIP based on scientific merit to support public health and safety, having regard to Ministerial policy and international alignment. The assessment found there is minimal evidence to suggest that nutrient declaration requirements in the NIP require regulatory change to assist consumers to make informed choices in-line with dietary guidelines.
Terminology The terminology used for nutrient declarations, e.g. 'sodium', 'saturated fat'.	'Sodium' is a confusing term for consumers.	The literature review found that consumers do not necessarily understand the precise relationship between sodium and salt. Focus group participants generally knew that sodium and salt were related terms. In the CIT, 77% of consumers could correctly identify which of two hypothetical labels had the lowest amount of 'salt' by using the sodium declaration. Many focus group participants displayed poor understanding of fat sub-components but generally understood trans and saturated fat were 'bad'.	Although existing literature suggests that consumers may not understand the technical relationship between sodium and salt, an objective measure of consumers' ability to use the information suggests that consumer understanding is sufficient to make choices in-line with dietary guideline recommendations. Similarly, while consumers may not understand the technical nature of trans or saturated fatty acids they understand that these are nutrients of which to limit intake, which is in-line with dietary guidelines. There is therefore no evidence of a need for regulatory change.

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Expressions The units of measurement that are used to express the average quantity of energy or nutrients in a food (e.g. kilojoules, grams, millilitres, etc.).	Kilojoules should continue to be used as the energy unit, although consumers may understand calories better. Use of calories may facilitate international trade.	The literature review found that consumers do not always know that kilojoules and calories measure the same thing. The term 'energy' can also be confused for sugar, fat, or the subjective feeling of being energised. Many focus group participants did not understand the meaning or relevance of energy information. Kilojoules were poorly understood and were seen as hard to interpret relative to calories.	Kilojoules have been in use since the NIP was mandated in the Code and was selected to reflect the international system of units and adoption of the metric system in Australia and New Zealand. While kilocalories are used overseas, changing the required energy units in the Code would impose an unjustified cost on industry and risk confusing consumers in both countries who have been provided with energy declarations in kilojoules for more than 20 years. Kilocalories can be provided voluntarily in addition to kilojoules, which facilitates international trade. This issue may be more appropriately addressed through nutrition education.
Numeric information The provision of nutrient content and serving information in numeric format (e.g. as quantity in grams or millilitres).	No stakeholder views were provided on this issue.	Focus group participants had difficulty understanding how numerical information in the NIP (e.g. grams, milligrams, kilojoules) translated to a healthy diet, including whether values are high or low. Focus group participants also found it challenging to make calculations using the numeric information provided (e.g. to translate numerical values into how much is actually consumed).	This finding should be considered in the context of other findings which indicate consumers value and use the NIP, the purpose of the NIP as per this paper and the range of nutritional literacy across the population. There are limitations for a labelling element like the NIP to cater for the range of nutritional literacy across the population. If the HSR system is not mandated, additional work may need to be undertaken by FSANZ to determine if the NIP can better support consumers to make healthier food choices in the absence of a front-of-pack nutrition labelling scheme.

Issue	Stakeholder Views	Evidence base	FSANZ's preliminary response
Legibility Potential font, colour, and size requirements to assist consumers to read the information.	NIP should have more prescriptive requirements for legibility, particularly for consumers with reduced vision. Balancing labelling space with legibility remains a challenge and would welcome additional guidance.	Focus group participants reported that small font size, poor colour contrast and inconsistent placement on packaging makes information hard to find or read. However, consumers generally could recognise and locate the NIP, even if placement varied slightly. Some participants suggested formatting changes to improve readability, such as bolding or colouring key or mandatory nutrients.	General legibility requirements in the Code require mandatory information on food labels to be legible and prominent, contrast distinctly with the background, and be in the English language. Specific font sizes or colours are generally not prescribed in the Code, recognising there are different ways information on food labels may be presented while remaining legible. However, consistent format of the NIP has been identified as a key enabler for consumer recognition and understanding (see also Appendix C: Prescribed format of the NIP). FSANZ views the consumer evidence on legibility of the NIP reflective of general concern by some stakeholders with the legibility of mandatory food labelling information. This issue extends beyond the scope of the NIP review.
Online sales The availability of nutrition information, including NIPs, in online retail environments.	The NIP must be readily available when purchasing food, including online. Not having access to this information hinders consumers' ability to make informed food choices.	Online sales was not a focus of consumer research for this review.	Considered in the 'What we have found so far' section of this paper.

Appendix B. Consumer research references

Review of reviews

In August 2024, FSANZ reviewed systematic and narrative reviews relating to consumer use, understanding, and trust of the NIP.

A search[1] of EBSCO and Web of Science online databases identified 15 reviews ranging in publication date from 2005 – 2024.

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[1] *TI (“nutrition information” OR "nutrition fact*” OR “nutrition declaration*” OR “nutrition information panel*” OR “nutrition panel*” OR “nutrition information*” OR “nutrition label*” OR “nutrition table*” OR “back of pack label*” OR “back-of-pack label*”) AND AB (“systematic*review” OR “review” OR “literature*review” OR “meta*analysis” OR “meta*synthesis”) AND AB (understand* OR aware* OR behav* OR interpret* OR trust* OR use* OR utilis* OR value* OR effect* OR intention*)*

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Rapid literature review: Australia and New Zealand evidence

In September 2025, FSANZ undertook a rapid literature review of consumer evidence relating to consumer use, attitudes, knowledge, experience and expectations of the NIP in Australia and/or New Zealand.

A search[2] of EBSCO and Web of Science online databases was combined with references provided by stakeholders as part of FSANZ call for information, as well as citation searching, to identify 15 original peer-reviewed studies, ranging from 2004 – 2025.

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[2] *('Nutrition information Panel' OR NIP) AND (Australia* OR New Zealand*)*

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Appendix C. Prescribed format of the NIP

A NIP is required to be presented in the format specified in section S12—2, unless the Code provides otherwise[3]. The Code specifies a tabular format with border, columns and headings, and the order and grouping of nutrients. However, NIPs are not always provided in a consistent format across products as additional information may be required in the NIP if certain nutrition content or health claims are made (such as dietary fibre, if a claim is made about sugar), and can also be voluntarily provided if certain conditions are met (such as %DI).

While the intent of the prescribed format is to assist consumers to access and use the available information, there are diverse stakeholder views on the current format. Views identified related to prescribed format identified from stakeholder feedback and consumer research include:

- the prescribed format is a barrier to international trade
- sub-groupings of nutrients (e.g. saturated fat as a sub-group of fat, or sugars as a sub-group of carbohydrate) are poorly understood by consumers
- inconsistencies in voluntary declarations or elements across NIPs are confusing and add complexity.

This section investigates these views and provides preliminary conclusions.

Previous work

In the late 1990s, Australia New Zealand Food Authority (ANZFA) undertook a review of nutrition labelling to determine whether a specific NIP format (table, columns, order of nutrients, names of nutrients) should be prescribed (Proposal P167). During consultations, many submitters argued in favour of a prescribed NIP format to allow for comparison between foods and to enhance use of the information by consumers. Only one industry submitter argued against a prescribed panel format, on the basis that it wouldn't impact consumer use and understanding.

Consumer research found that consumers preferred and could better utilise a standardised format. Consistency, including consistency of nutrients declared and the order in which they are provided, was found to be essential to enable use and understanding of the information. It further enables quick comparison between products. These findings were supported by a literature review, which also found that consistency in format facilitated greater use of the information, particularly for vulnerable consumers. Following the review, the current prescribed format of the NIP was mandated.

As part of FSANZ's response to the 2011 *Labelling Logic* report, FSANZ commissioned a literature review to examine the impact of label format on consumers' attention and comprehension for mandated label elements. The review included 61 articles. It found that a table format can enhance the speed at which label information can be accessed compared to text, and that consistent location, format and terminology assist consumers to find and use nutritional information.

Ministerial policy guidelines

The *Policy Guideline on Food Labelling to Support Consumers to Make Informed Healthy Food Choices* specifies that 'information that enables consumers to identify foods that

[3] Small packages with a surface area of less than 100 cm^2 and specific products have differing requirements.

contribute to healthy dietary patterns recommended in the Dietary Guidelines is a public health priority and therefore sits towards the mandatory end of the 'dominant mode of intervention''.

It also establishes that this information should be easily accessed and understood by consumers, and support consumers to compare foods.

Overseas regulations and international guidelines

There is limited international consistency in nutrition labelling formats, including presentation, mandatory declarations, terminology, and unit values. The UK, US, and EU do not mutually recognise or accept each other's formats, or the Australian/New Zealand format.

The USA and Canada have very prescriptive requirements for the format of nutrition information, including lines and border, size of text, font, spacing, bolding of certain elements, use of capital letters, and colour. The order of nutrients is prescribed for both voluntary and mandatory nutrients, and nutrients that are a sub-category of another nutrient are required to be declared indented below it.

In the EU and the UK, there is more flexibility in the overall format, with a tabular format preferred but a linear format accepted if space does not permit. There are minimum font size requirements, and the order of nutrients is prescribed. Sub-categories for fat and carbohydrate must be declared with the term 'of which' and a dash.

The Code requirements for the NIP are generally consistent with the Codex Guidelines on Nutrition Labelling, which state that:

- nutrition content should generally be declared in a numerical, tabular format;
- nutrients should be declared in a specific order developed by competent authorities and should be consistent across products.

However, in the case of sub-categories, the Guidelines recommend the term 'of which' is used, unlike in the format prescribed in the Code, whereby the sub-categories are listed under the main category and preceded by a dash.

Consumer research

Focus groups

Focus group research found that consistent NIP formats supported easy comparisons and trust in the food system. However, inconsistencies in non-mandatory declarations caused confusion. For example, when comparing two ice-cream products, participants were unsure how to interpret the absence of a trans fat declaration in one versus '<1g' in another.

Some participants found the NIP easy to scan for key nutrients, while others felt it was too complex, particularly when optional elements like %DI values were included. Participants recommended greater consistency, removal of optional items, and consideration of mandatory rather than voluntary declarations for fibre and select vitamins/minerals.

Existing literature

The literature reviews support these findings. Consistency and familiarity with the NIP format were identified as key enablers of consumer understanding (Cowburn & Stockley 2005) and trust (Tonkin, Meyer et al. 2016). Conversely, poor layout and difficulty locating the panel were noted as barriers to use and comprehension (Mandle et al. 2015). Additionally, when

the NIP was overly detailed or hard to locate, trust could be compromised (Tonkin, Webb, et al. 2016).

Preliminary conclusions

The Code prescribes a consistent format for the NIP to assist consumers to access the information provided. Evidence has shown over the last 25 years that consistency is a key enabler of consumer use and understanding of nutrition information. A consistent format for the NIP therefore aligns with the Ministerial policy guidance that food label information should be easily accessed and understood by consumers and support consumers to compare foods.

While the evidence indicated that additional information in the NIP can confuse some consumers, FSANZ does not believe that companies should be prohibited from providing such information where it is not misleading. This additional information is important for consumers in instances where a nutrition content or health claim has been made for example. Code provisions were introduced recognising the value of this additional information (which includes voluntary information such as %DI) and FSANZ considers this remains relevant today despite changes in the food supply and policy environment since the NIP's introduction.

Regarding consumer confusion associated with sub-groupings of nutrients, there is no evidence that consumers are unable to use existing sub-grouped nutrient declarations to make informed choices. Focus group data suggests that, while consumers may not understand the technical difference between 'saturated fat' and 'fat, total', they are still generally able to recognise these are nutrients to limit intake of, and can use the NIP to meet this aim. There is therefore minimal evidence that there is a regulatory problem associated with this aspect of the NIP format. FSANZ considers that a lack of understanding of nutrient subcategories is a broader issue associated with nutritional literacy, and there are limitations for a labelling element like the NIP to address general nutritional literacy in the population.

FSANZ had regard to international alignment, however found that there is limited consistency internationally. Nutrition information panels are designed to provide consumers with the information they need to make healthy and informed food choices, and as a result requirements are sensitive to the needs of the local population in terms of nutritional literacy and national dietary guidelines. The prescribed format of the NIP has long-term familiarity with Australian and New Zealand consumers, is generally consistent with Codex Guidelines on Nutrition Labelling, and is grounded in consumer evidence of its effectiveness. FSANZ is therefore of the view that accepting overseas nutrition information would not support Australian and New Zealand consumers to make healthy food choices in-line with dietary guidelines and has the potential to undermine trust in our nutrition labelling requirements.

Appendix D. ‘Per serving’ information

A NIP is required to present the average quantity of nutrients in two forms: ‘per 100 g’ (or ‘per 100 mL’ for liquid foods) and ‘per serving’[4]. Providing information in a consistent ‘per 100 g/mL’ format allows consumers to directly compare nutritional values between products, while ‘per serving’ information allows consumers to more easily estimate the nutritional content in a quantity of food they are eating.

To facilitate consumer understanding of the serving information, the NIP is required to include the number of servings per package and the average size (in grams or millilitres) of one serving. Common household measures may optionally be included to assist in interpretation of the serving size.

Serving size information underpins %DI and %RDI values and provides the basis of many nutrition content and health claim conditions.

A ’serving’ is defined in Standard 1.1.2 as ‘an amount of food which constitutes one normal serving when prepared according to manufacturers’ directions or when the food requires no further preparation before consumption’[5]. This was intended to provide food businesses with the flexibility to communicate what constitutes a ‘normal’ amount of their product for consumption.

Views related to serving information identified from stakeholder feedback and consumer research include:

- consumers perceive serving sizes as of limited relevance or untrustworthy as they do not always align with how people typically consume the product
- numeric serving size information is confusing and difficult to use
- consumers may inappropriately compare nutrients ‘per serve’ between products that have different serving sizes
- serving size information may be inconsistently implemented across products, increasing confusion.

This section investigates these views and provides preliminary conclusions.

Previous work

The requirement to provide serving size information as a reference unit in a NIP predates the mandating of the NIP itself. During the development of the joint Australia New Zealand Food Standards Code in the late 1990s, a review of nutrition labelling concluded that per serving information should be retained in the NIP because consumers were already familiar with this format, and the requirements were consistent with Codex Alimentarius. It also determined that suppliers should retain the ability to determine the serving size because:

- food businesses could approach intake recommendations with reference to products’ specific nutrient profiles
- there are inherent difficulties in attempting to standardise serving sizes due to differences in consumption amounts between different products and population subgroups
- consumers could still make direct comparisons using per 100g/mL information.

[4] Terms like ‘slice’, ‘pack’, or ‘package’ may also be substituted for ‘serving’, as appropriate.
[5] In the case of a formulated meal replacement, a serving is equivalent to one meal.

In 2011, the review of food labelling law and policy recommended that, to reduce the volume of information in the NIP, 'per serving' information should only be mandated where a daily intake claim is made (Recommendation 17). FSANZ's analysis of the recommendation found:

- broad stakeholder opposition
- insufficient evidence of a problem with 'per serving' information
- a lack of a benefit for consumers or industry.

At a meeting in November 2015, food ministers accepted FSANZ's advice that no further work be undertaken on this recommendation.

Ministerial policy and national dietary guidelines

The *Policy Guideline on Food Labelling to Support Consumers to Make Informed Healthy Food Choices* specifies that information that supports consumers to apply the recommendations in dietary guidelines should be provided on food labels in a format which, among other things:

- is easily accessed and understood by consumers
- supports consumers to manage energy intakes to assist with achieving and maintaining a healthy body weight, and
- supports consumers to compare foods.

Both the Australian Dietary Guidelines and the New Zealand Eating and Activity Guidelines recommend the number of 'servings' per day include a range of whole food groups (such as vegetables, fruit, grains, legumes, and dairy). These servings are defined by kilojoule content and do not correspond to the 'servings' declared on labels.

Although the Australian Dietary Guidelines predominantly focus on a whole foods approach, they nevertheless recommend limiting intake of total fat, saturated fat, and dietary sodium below numeric daily reference amounts. Similar numeric recommendations are not present in the New Zealand Eating and Activity Guidelines.

Overseas and international approaches

There is a lack of harmonisation across international jurisdictions' requirements for 'per serving' information.

In the USA and Canada, energy and nutrient declarations are required as an amount 'per serving' of food and as a percentage daily value. Serving sizes are prescribed according to regulated reference amounts based on actual consumption data. In the USA, the number of servings per container and serving size information must be included. In Canada, only the serving size must be declared.

In the United Kingdom and the EU, energy and nutrients must be declared per 100 g/mL of the food. Energy and nutrients may also voluntarily be expressed per portion and/or per consumption unit (a unit that can be consumed individually), provided the portion or unit used is quantified on the label and number of portions or units in the package is stated.

The Codex Alimentarius *Guidelines on Nutrition Labelling* state that nutrient declarations should be expressed per 100g/mL, or per package if the package contains only a single portion. In addition, nutrient declarations may be given per serving as quantified on the label or per portion, provided that the number of portions contained in the package is stated.

Consumer research

Focus groups

The focus groups indicated that consumers find ‘per serving’ information valuable for tracking nutrient intake, to guide portion sizes, and to understand how many people a package will serve. Some consumers used ‘per serving’ information to compare information across products when serving sizes differed. While some did this because they did not understand that the ‘per 100 g’ column provided like-for-like comparisons, others preferred to compare based on their anticipated consumption amounts.

Some participants were critical of serving size information, indicating their food intake did not match the serving size recommendation, rendering this information irrelevant or making it challenging to calculate their nutrient intake.

Participants found contextual serving size information useful alongside grams/millilitres. Standardised measurements such as cups, teaspoons, or the number of individual items (e.g. 10 chips), were preferred to measurements which may be subjective (e.g. scoop).

Existing literature

The literature found consumers prefer having both ‘per 100g’ and ‘per serve’ information, although consumers appear to be more prone to error when interpreting per serve information (Grunert & Wills 2007; Mandle et al. 2015; Volkova & Ni Mhurchu 2015). Several literature reviews reported that consumers struggled to use numerical information, including serving sizes (Cowburn and Stockley 2005; Campos et al. 2011; Grunert and Wills 2007; Azman et al. 2021). Some consumers may also use the per serve column to compare products even when serving sizes are different (Ni Mhurchu and Gorton 2007).

Confusion can arise where serving sizes do not align with actual consumption (FSANZ 2024; Grunert and Wills 2007). One study found that serving sizes perceived as unrealistic (e.g. a 600mL carton of drink containing ‘2.4 serves’) could undermine trust in the food system (Tonkin et al. 2016).

FSANZ’s 2025 Consumer Insights Tracker

In the 2025 CIT, 32.4 – 45.8% of consumers reported looking at ‘per serving’ information for energy or any individual nutrient. 37.9% look at serving size (g) and 39.5% look at servings per package.

The CIT data found that consumers were far more likely to successfully compare the NIPs of two hypothetical labels where the serving size was the same (80.4%) than when the serving sizes substantially varied (only 49.3%). Of those who were incorrect when serving sizes varied, most (71.2% or 30.8% of the overall sample) said they used the ‘per serving’ column to compare.

Preliminary conclusions

Serving information is a long-standing mandatory element of the NIP, predating the joint Code. Previous considerations of removing serving size as a mandatory element have found insufficient evidence of a regulatory problem associated with it or a benefit to removing it. Stakeholders expressed the view that serving information was valued by those managing diseases, health professionals, food businesses, and government agencies.

Ministerial policy specifies that food labelling information should be provided in a format that enables consumers to make informed food choices in-line with dietary guidelines. Per

serving information provides a mechanism for consumers to track nutrient intake in ways that align with the Australian Dietary Guidelines' recommendations to limit intake of fat, saturated fat, and sodium below certain daily amounts.

Focus group research found that consumers value 'per serving' information to track nutrient intake, as well as guiding expected portion sizes. This supports alignment with the dietary guidelines. However, serving information is less valued by consumers when the nominated serving sizes are perceived as unrealistic (i.e. not matching actual consumption) or are provided only in an abstract, numeric format (e.g. grams). Consumers preferred serving sizes to also be expressed using standardised household measurements (e.g. cups, teaspoons).

There is evidence that a substantial proportion (30.8%) of consumers may compare the nutrient content of products based on 'per serving' information even when the products have different serving sizes. However, this does not necessarily indicate a regulatory problem with the NIP, nor that the comparison is always inappropriate.

The NIP provides information to enable consumers to understand the average quantity of nutrients present in a serving and compare between products using a standardised measure (i.e. per 100 g/mL). Consumers' use of 'per serving' information to compare between products may be a result of low nutritional literacy. However, focus group data suggests it may also sometimes be a conscious choice in cases where consumers intend to consume a specific number of servings regardless of size. This is more likely for single-serve products or products that come in pre-defined portions (e.g. muesli bars).

FSANZ acknowledges that consumers may be confused about the appropriate use of 'per serving' vs 'per 100 g/mL' information, however considers this a broader issue associated with nutritional literacy. Removing mandatory 'per serving' information would not necessarily improve consumer understanding of the nutrient content of foods. If it became a voluntary element, or an element only required when a nutrition content or health claim is made, it would increase inconsistency in the format of NIPs across products (see also Appendix C: Prescribed format of the NIP) and limit consumer access to a valued piece of information that can help consumers manage medical conditions or meet recommendations in the Australian Dietary Guidelines.

The other option that has been proposed to improve consumer use and understanding of per serving information is to standardise serving sizes for categories of products.

Consideration was given to standardising serving sizes when the NIP was originally mandated. It was noted that the primary benefit of standardising serving sizes was to allow easy comparison between similar products, and that this was already possible through the provision of 'per 100 g/mL' information. It was also noted that there are inherent difficulties in attempting to standardise serving sizes due to differences in serving sizes for different products and different population subgroups.

The USA and Canada prescribe the serving sizes used in their nutrition panels, based on actual consumption amounts. This is primarily because there is no standardised unit for comparison between products (e.g. per 100 g/mL) in their nutrition panels. Maintaining standardised serving sizes based on actual consumption is a resource intensive task that can result in increased numeric complexity (i.e. decimal points) and confusion. This complexity typically occurs where prescribed serving sizes do not neatly correspond to the practicalities of manufacturing portioned products. For example, the standard serving size of a muesli bar may not correspond to the size of muesli bar that can be manufactured in a particular facility. Discrepancies between practical manufacturing conditions and prescribed serves may become increasingly likely as serving sizes are updated based on consumption amounts.

It is currently not clear the extent to which serving size varies between similar products in the Australian and New Zealand marketplace and, therefore, the extent to which consumers may be misled by inappropriately comparing products using 'per serving' information.

Pending the availability of further data, FSANZ's preliminary conclusion is that there is insufficient evidence to indicate a regulatory problem associated with 'per serving' information requirements in the Code. FSANZ considers that it provides useful information to consumers to allow them to manage their nutrient intake and does not prevent comparisons from being made between products using 'per 100 g/mL' information. FSANZ further considers that it is appropriate to retain industry flexibility for nominating serving sizes based upon their product's specific nutritional profile.

FSANZ acknowledges that industry has expressed a desire for greater guidance around serving size. Voluntary industry guides to serving size are available for certain product categories, such as *Be treatwise ®* for confectionery. In addition, the Australian Department of Health, Disability and Ageing has established an *Industry Guide to Voluntary Serving Size Reduction* through their Healthy Food Partnership. Although primarily focused on reducing the physical size of the products sold, it also suggests maximum serving sizes for a range of different products based on national and international guidance and/or reference amounts. Further guidance could be sought through this existing partnership.