

# FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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## SUBMISSION

5 February 2015

Attention: **Project Manager – Consultation Paper Labelling Review Recommendation 17:**  
Food Standards Australia New Zealand  
Box 7186,  
Canberra BC,  
ACT, Australia, 2610.

### **Re: Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition panel**

FTA Australia has reviewed this [Consultation Paper](#) and endorses the following comments of the Technical Sub Committee:

- The Committee has made the following points on the Consultation Paper in the context that we do not believe that the per serve information should be voluntary (answer to Q9):
1. The per serving is used to determine the nutrients eaten at a session. The per 100g information is good to compare products but the per serve gives the information on the amount consumed on any occasion
  2. Making the per serving voluntary will make major changes throughout the Code. It impacts not only the RDI but all nutrient content claims in the code. A per serving claim should be on the pack as the % daily intake is calculated with the serve size. Without the serve information this is harder to comprehend
  3. To ensure greater understanding of the panels there should be minimal variation in panels. The greater the variation in panels the more confusing it becomes to the general public.
  4. A serve size must be mandatory when a nutrient claim is made as otherwise a person is not going to be aware of how much of the nutrient they are actually consuming. For example having high fibre in product per 100 g is not much use if the amount for a serve is 10g – which greatly dilutes the amount of nutrient eaten.
  5. The change to make the per serve information voluntary would mean major changes to the code as many part of the code reference the per serve size. This includes 1.2.7 and 2.9. It is important for some nutrient that they are not overconsumed and for this purpose the per serve is a much better guide than the per 100 when there is no guide to what the serve size is. Vegemite is high in sodium (3000+mg), but the amount actually consumed per serve is low (175mg) which means it may be used as part of the diet.
  6. The confusion now where various pack sizes of the same product are said to be one serve is due the ACCC rules where it can be argued that one person could use a 330g or a 600g. This was highlighted last year in the TV show 'The Checkout'. It would be useful to work with ACCC to see how the confusion around what constitutes a serve can be resolved. It would be much more useful to standardize or give guidance as to what constitutes a serve so the information can be more useful to industry, health professionals and consumers

If there are any queries regarding this submission, please contact the Technical Secretary of the Technical Committee, [REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Consultation paper](#).

Yours sincerely,

Del Teesdale  
PRESIDENT – FTA AUSTRALIA