

Consultation Paper – Labelling Review Recommendation

17: Per serving declarations in the nutrition information panel

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

This will depend on what further benefits that we can claim on our packaging. As we are predominately in the Health food market, the amount of claims we make with regards to per serving information is invaluable. Using the recommended serving of 30g of nuts per day helps to promote our products, whether they are a single serve or larger pack size.

We generally use the same per serving size across all of our products (with a couple of exceptions) as our core. This gives a 'helpful' amount that can help consumers who are watching serving sizes from eating excessive amounts.

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? If so, what are they? Explain why the information is useful.

We have a number of products that are packaged for a 30g single serve, which we find are for convenience and a healthy serving. Increasingly people are snacking on food whilst they are out and about. We have developed a number of nut products in convenient single serve pack types for people for snacking on the go and out of home.

We find that consumers are looking for snacks in portion controlled, single serve options and we cater for this market.

On the majority of products, per serves are helpful. This can range from single serve packaging to products where further preparation is required (coffee, milk powders, cake mixes, etc.).

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.

Per serving information is a recommendation by the manufacturer of what is a suggested serve. This is a realistic portion size that we see as deemed fit for the consumer.

We support this new approach as this will be able to help consumers make better decision when it comes to portion size / daily intake values.

Consumers will have better understanding and further confidence in food products when knowing that the daily intakes per serving have been regulated to current food laws and regulations. Products would have been verified through any means possible to meet these the requirements as stated by the manufacturer.

Q4 As noted above, 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?

This could be a problem. The manufacturer is making a recommendation to their consumers of what they believe is in best interest (Their best interest). Manufacturers may base this on their industry standards. For example, those in the confectionery industry may still promote their 'be treatwise' of 25g per serve and with nut nutrition to consume 30g per day which is considered to be one healthy handful.

It would be made easier for consumers if all products contained the per serving requirements or none at all. Manufacturers that complete in the same food category may or may not adopt this, which may lead to one manufacturer making claims and the other not making claims, which can become confusing for consumers.

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? Give reasons for your answer.

With any claims that are to be made about any nutritional criteria then this must be included in the nutritional panel. All claims must be validated for the consumer to prevent anything being misleading.

All claims, serving suggestions, RDI's, health star ratings etc, must be validated whether it is in the mandatory criteria or not. The will help put trust back into brands knowing that this is what they are getting every time.

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? Explain your answer.

To keep everything simple for the consumers it either has to be made voluntary or compulsory. Per serving guidelines should be made mandatory across all products, no matter what group or sector. All information that is based on 100g / 100ml in the nutritional panel is technically a claim, therefore should not be differential treatment based upon per serving guidelines as specified by the manufacturer.

Q7 What additional studies examine consumer use and understanding of per serving information in the nutrition information panel on food labels? Please provide a copy of studies where possible.

We are preferring the current system of using the per serve and per 100g serving to remain unchanged and we have considered this. We have also run our own focus groups in relation to new products and serving sizes were not for discussion as an item or in discussion with participants.

We have not completed any studies for consumer use with regards to per serving information in the nutrition information panel on food labels.

Q8 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 potential advantages of this will be easier to help the consumer to understand serving sizes and any benefits the product has to offer. It would be ideal if food categories are defined with mandatory serving sizes (as stated above in question 4). If everything was mandatory for all food categories this can help educate the consumers on making better choices. As mentioned in the *labelling review 17* section 6, that the different concepts can be confusing.

The potential disadvantages would be that information promoting any benefits or claims will be non-existent if there is poor understanding of the code. When there are larger sized products, consumers may think that the whole product is one serve. Not having the per serving column would go against all the policies and education provided / promoted to consumers to endorse a healthy diet.

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 reasons and evidence to support your view.

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

This should not be voluntary.

We believe that to help keep things as simple as possible is to have a per 100g and per serving column for all products. When consumers look at food labels they need to be kept as easy as possible. Having a variety of options, manufacturers may manipulate to their own benefit and not to the consumer.

Per serving columns are for the consumer which can be valuable for making better choices.

Best Regards,

[REDACTED]

New Product Development Manager – Consumer

Select Harvests Limited

360 Settlement Rd

Thomastown, 3074 Vic

PH: + 61 3 9474-3544

PH: + [REDACTED]

FAX: +61 3 9474-3588

Mobile: [REDACTED]

[REDACTED]

Web: www.selectharvests.com.au