

Food Standards Australia New Zealand

PO Box 10559, Wellington, 6011

New Zealand

13 February 2015

**Thank you for the opportunity to provide comment on the Consultation Paper – Labelling Review
Recommendation 17: Per serving declarations in the nutrition information panel**

Frucor Beverages Ltd. is an Australasian manufacturer of beverages with a brand portfolio that includes leading brands of waters, fruit juices, fruit drinks, energy drinks, sports waters and soft drinks.

Frucor personnel are active members of the New Zealand Beverage Council [previously the NZ Juice and Beverage Association (NZJBA)], New Zealand Food and Grocery Council (NZFGC), New Zealand Nutrition Foundation and the NZ Fruit & Vegetable Alliance (NZ FAVA) by providing executive and technical expertise on several working groups within these organisations.

Frucor has been shown to take a lead role within the beverage sector via new product development (NPD), sales and marketing strategies which include a commitment to providing healthier options. On-going innovation to our beverage range includes the offering of smaller pack sizes (smaller volume bottles), specific lower sugar/zero sugar products and functionality.

Our comments are attached separately.

Yours sincerely



NZRD, Nutrition & Claims Manager



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Food Standards Australia New Zealand

CONSULTATION PAPER – LABELLING REVIEW RECOMMENDATION 17: PER SERVING DECLARATIONS IN THE NUTRITION INFORMATION

13 February 2015

Frucor Beverages Ltd. welcomes the opportunity to comment on the ***Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition information.***

The serving size declaration is useful not only for consumers with focus and awareness for eating well but is also used as an educational tool by nutritionists and other public health practitioners to be able give consumers guidance around appropriate serving sizes based on the energy density of food and beverages.

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

For multi-serve beverages, we may refer to a standard 250mL cup or glass e.g. for juice or juice drinks. We also have portion-controlled tetra-packs which are 125mL, 250mL and 250mL and 355mL cans. Where we have larger pack sizes, we have taken guidance via both the Australian and New Zealand Beverage Councils in recognizing that a 500mL energy beverage for example, is equivalent to 2 servings of 250mL. In other instances, where there is an industry norm e.g. sports drinks and sports waters, one serving is more likely to be 750mL and this is reflective of how these beverages are used by the target consumer.

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.

For multi-serve beverages, we may refer to a standard 250mL cup or glass e.g for juice or juice drinks. We also have smaller portion-controlled packs which are 125mL or 250mL across some of our juice brands. These are designed specifically with portability in mind, but are also more suited for schools canteens, institutions and food service.

There are a number of programmes and clients e.g. the Fuelled4life schools programme and hospital board national contracts via a food service provider, where there is nutrition criteria for beverages. There are criteria which cover macronutrients as well as maximum pack sizes for different categories of beverages (see separate attached PDF file).

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.

Yes, we agree that it would be appropriate for serving size to be mandatory if a %DI or %RDI claim is made. Consumers do not consume our products in 100mL amounts, but are more likely to consume a single serve or portion and in the case of a multi-serve, be able to determine how many servings a product provides.

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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 more confusing for consumers who may already be using the NIP information in its current format. The additional column for foods where other ingredients are added before consumption is useful given that these foods are not generally consumed without some preparation. The only beverage example we manufacture are juice concentrates which needs to be diluted before being consumed. This question is more appropriately responded to by other sectors of the food industry that produce meal bases or components where addition preparation is required before the food is ready to eat e.g. breakfast cereals, baking mixes, rice, pasta and soup mixes.

The food industry constantly struggles to retain credibility with consumers and this could be seen as “non-disclosure” of information which may be useful to consumers, dietitians, nutritionists, health care professional, sports practitioners, food writers and food media.

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.

Yes, as previously stated, consumers tend to eat or drink a serving of food rather than 100g or 100mL of a product. A useful guide is an “average serving” – although this tends to be considered broadly with a lack of consistency across what is used by industry, nutrition and health professionals and food media.

Frucor considers the need for further work to establish officially recognised standard serve sizes across categories of food and beverages. The beverage sector has gone some way towards establishing these however there needs to be a more extensive body of work undertaken to

While there is an absence of official standard serving sizes, the Australian and NZ food composition data is generally where we seek guidance of average serving data across an extensive range of foods.

References: NUTTAB; AUSNUT and the NZ Food Composition database.

<http://www.foodcomposition.co.nz/>

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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.

If a claim is made for Energy, fat or sugar, per serving information is more useful if per serving information is displayed on the NIP. With many products being reformulated to be a healthier option or choice, it is useful to be able to compare a serving of a food within a category e.g. comparison of a serving of fruit juice and a diluted version of fruit juice; or a full fat flavoured milk beverage with a lower fat flavoured milk drink.

Irrespective of whether per serve information is voluntary or mandatory, we see a need for the basis for arriving at or establishing a serve size should be further considered. The relative merits of using different reference data and the merits of aligning various sources including the approach devised for the Health Star Rating Scheme need consideration. Although this may reduce variability of a voluntary system, it would have the same effect for the mandatory system and a distinction about undertaking such work only for a voluntary system should be reconsidered.

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.

The New Zealand Nutrition Foundation “emark” was the result of a collaborative project with Plant and Food Research NZ and considered the above.

<http://www.emark.co.nz/>

<http://www.emark.co.nz/what-are-emarks/serving-sizes>

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.

Advantages: Less cluttered NIP if only voluntary

Disadvantages: Cost implication of transitioning from old mandatory system to new voluntary system may not be too much for larger manufacturers who already , but could be expensive for smaller businesses; there would be a mix of old and new labels in the market place which could be seen as confusing; consumers may see this as an example of the food industry removing information or “hiding” information; could be viewed as a fragmented food industry position where there will be a mixture of labelling in the market place.

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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, we currently declare the amount of energy and nutrients per serving in the NIP and would likely continue to do so as we consider this provides consumers with useful information on our range of beverages.

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. We are likely to retain the status quo on beverages as these are generally consumed as a portion or serve rather than in per 100g or 100mL amounts. If voluntarily provided by manufacturers, then it would assume that consumers would be able to calculate the energy and nutrients per serving based on the amount that they actually consumed. There is on balance a need for consumers to understand what an appropriate portion size is for themselves. The most commonly used guide by nutritionists is that a portion of food is based on the energy density of the food and as a general rule this might be translated into what can fit in the palm of your hand or standard cups and measures or visual representations that are used to describe a serving of the food.

Without official serving sizes manufacturers have tended to adopt industry agreed reference values or the reference values already used for vitamins and minerals.

Evidence: <http://www.emark.co.nz/what-are-emarks/The-science-behind-eMarks>

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Food and Beverage Classification System

Nutrient Framework for Schools

Occasional foods

There are certain foods that automatically fall into the occasional category due to these foods being too high in energy and/or saturated fat and/or added sugar and/or sodium and provide minimal nutritional value.

For school children these foods and beverages are:

1. confectionery¹
2. deep-fried foods
3. full-sugar and artificially sweetened energy drinks²
4. full-sugar drinks
5. foods and beverages containing caffeine >56mg/serve

There are other foods and beverages that are not recommended for sale or provision in schools. These are any beverages labelled with “not recommended for children” and any food or beverage labelled “dietary supplement”.

Notes:

- This framework is for school-aged children.
 - Products must meet all criteria to be classified as either everyday or sometimes.
 - The symbol > means greater than.
 - The symbol < means less than.
 - The symbol ≥ means greater than or equal to.
 - The symbol ≤ means less than or equal to.
-
1. Confectionery includes a range of sugar-based products, including boiled sweets (hard glasses), fatty emulsions (toffees and caramels), soft crystalline products (fudges), fully crystalline products (fondants), gels (gums, pastilles, and jellies), and chocolate.
 2. An energy drink is a non-alcoholic water-based flavoured beverage which contains caffeine and may contain carbohydrates, amino acids, vitamins and other substances, including other foods, for the purpose of enhancing mental performance.

Product Category	Classification		
Beverages [#]	Everyday	Sometimes	Occasional
Water Includes carbonated water.	All plain water with nothing added	Not applicable	Not applicable
Flavoured and/or fortified water and sports drinks	Not applicable	Energy ≤ 60kJ/100ml Energy ≤ 350kJ/serve Total sugar ≤ 3g/100ml	Energy > 60kJ/100ml Energy > 350kJ/serve Total sugar > 3g/serve
Carbonated drinks Examples include 'diet', 'light' and 'zero' carbonated drinks (soft drinks).	Not applicable	Package size ≤ 600ml Energy ≤ 60kJ/100ml Total sugar ≤ 3g/100ml	Package size > 600ml Energy > 60kJ/100ml Total sugar > 3g/serve
Vegetable and/or fruit juice Examples include pure vegetable and/or juices.	Not applicable	Package size ≤ 250ml	Package size > 250ml
Vegetable and/or fruit drinks Examples include fruit flavoured drinks and fruit smoothies.	Not applicable	Package size ≤ 250ml or Package size ≤ 350ml and Energy ≤ 90kJ/100ml	Package size > 350ml or Package size > 250ml and Energy > 90kJ/100ml
Pre-diluted fruit juices 50% or more dilution	Not applicable	Package size ≤ 350ml No added sugar	Package size > 350ml
Flavoured milks and drinking yoghurts Examples include flavoured cow's milk, soy milk and rice milk.	Not applicable	Package size ≤ 350ml Energy ≤ 400kJ/100ml Total fat ≤ 3.3g/100ml Total sugar ≤ 10g/100ml	Package size > 350ml Energy > 400kJ/100ml Total fat > 3.3g/100ml Total sugar > 10g/100ml
Milk* Examples include plain cow's milk, soy milk, goat's and rice milk.	Total fat ≤ 2.0g/100ml	Total fat ≤ 3.3g/100ml	Total fat > 3.3g/100ml

[#] Products with a package size ≥ 1.8 litres are considered multi-serve products and are for catering purposes only.

Multi-serve products should not be directly sold or provided to children.

* Excludes cream. For recommendations on the use of cream see the catering guidelines.

Flavoured and fortified water: A carbonated or non-carbonated water-based flavoured beverage that may or may not contain added vitamins and/or minerals, prepared from one or more of the following; water, fruit extracts and sugars.

Fruit juice: The liquid portion, with or without pulp, obtained from fruit including products that have been concentrated and later reconstituted with water to a concentration consistent with that of the undiluted juice from which it was made. No more than 40g/kg of sugars may be added to juices.

Fruit drink: A product prepared from one or more of the following; fruit juice, fruit purée, concentrated fruit juice, concentrated fruit purée, comminuted fruit, orange peel extract, water, mineralised water, and sugars. Fruit drinks must contain no less than 50mL/L of fruit, except in the case of passionfruit drink, which must contain no less than 35mL/L of passionfruit.

A sports drink (electrolyte drink) is a drink formulated and represented as suitable for the rapid replacement of fluid, carbohydrates, electrolytes and minerals.

Product Category	Classification		
Vegetables and fruit	Everyday	Sometimes	Occasional
Fresh, canned and frozen vegetables and/or vegetable mixes Excludes potato, kumara, taro and tapioca.	No added fat	Saturated fat ≤ 1.5g/100g	Saturated fat > 1.5g/100g
Potato, kumara, taro and tapioca Examples include fresh, frozen or mashed potato, kumara, taro and/or tapioca products.	No added fat No added salt	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 450mg/100g
Fresh, frozen and canned fruit, fruit tubs and puréed fruit	≥ 85% fruit content* No added fat No added salt No artificial sweetener or ≥ 60% fruit content* No added fat No added salt No added sugar^ or artificial sweetener	All other fresh, frozen and canned fruit, fruit tubs and puréed fruit	Not applicable

* Fruit content includes whole fruit, fruit pieces and fruit purée

^ Added sugar includes concentrated, refined and deionised fruit juice

Product Category	Classification		
Breads and cereals	Everyday	Sometimes	Occasional
Rice, pasta, noodles and couscous Examples include fresh and dried pasta, rice, couscous, noodle cups/instant noodles, rice risotto and savoury rice, and canned spaghetti.	No added fat No added salt	Energy ≤ 1000kJ/100g Saturated fat ≤ 1.5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 1.5g/100g Sodium > 450mg/100g

Breads or bread products and fruit breads Examples include all wholemeal, wholegrain, multigrain and white breads, muffin splits, crumpets, bagels, wraps, flat breads, rolls, fruit breads, non-iced buns, rewena bread, fa'apapa, garlic bread and croissants.	Saturated fat ≤ 1.5g/100g Sodium ≤ 450mg/100g Fibre ≥ 3g/100g	Saturated fat ≤ 4g/100g	Saturated fat > 4g/100g
Breakfast cereals Examples include wheat biscuits, bran, rice and corn flakes and bubbles, rolled oats and muesli.	Saturated fat ≤ 1.5g/100g Sugar ≤ 15g/100g (≤ 20g/100g for cereals containing fruit) Sodium ≤ 450mg/100g Fibre ≥ 8g/100g	Saturated fat ≤ 4g/100g Sugar ≤ 20g/100g (≤ 25g/100g for cereals containing fruit) Sodium ≤ 600mg/100g Fibre ≥ 4g/100g	Saturated fat > 4g/100g Sugar > 20g/100g (> 25g/100g for cereals containing fruit) Sodium > 600mg/100g Fibre < 4g/100g

Product Category	Classification		
Milk and milk products	Everyday	Sometimes	Occasional
Milk* Examples include plain cow's milk, soy milk, goat's and rice milk.	Total fat ≤ 2.0g/100ml	Total fat ≤ 3.3g/100ml	Total fat > 3.3g/100ml
Cheese Soft and hard cheese. Examples include ricotta, cottage cheese, cheddar, cheese slices and cream cheese.	Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	All other cheeses	Not applicable
Milk-based snack foods Examples include yoghurt, custards, dairy desserts and creamed rice, and soy versions of these items.	Energy ≤ 600kj/serve Saturated fat ≤ 1.5g/serve Total sugar ≤ 15g/100g	Energy ≤ 1000kj/serve Saturated fat ≤ 3g/serve Total sugar ≤ 17g/100g	Energy > 1000kj/serve Saturated fat > 3g/serve Total sugar > 17g/100g
Flavoured milks and drinking yoghurts Examples include flavoured cow's milk, soy milk and rice milk.	Not applicable	Package size ≤ 350ml Energy ≤ 400kj/100ml Total fat ≤ 3.3g/100ml Total sugar ≤ 10g/100ml	Package size > 350 ml Energy > 400kj/100ml Total fat > 3.3g/100ml Total sugar > 10g/100ml

* Excludes cream. For recommendations on the use of cream see the catering guidelines.

Product Category	Classification		
Meat, fish, seafood, poultry and meat alternatives	Everyday	Sometimes	Occasional
Fresh, frozen, canned and pouched fish and seafood Examples include plain fish fillets and plain and flavoured canned and pouched tuna.	No added fat No added oil Sodium ≤ 500mg/100g	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 500mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 500mg/100g
Processed meat, fish, poultry and seafood products Examples include mince meat patties, crumbed or coated poultry and fish, fish patties, fish fingers, surimi, and other processed seafood.	Not applicable	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 450mg/100g
Meat, poultry and eggs Examples include plain beef, lamb, pork, chicken and turkey, plain mince (with no added ingredients) and egg dishes.	Visibly lean, unprocessed meat and poultry Eggs cooked with no added fat and no added salt	All other unprocessed meat and poultry and egg dishes	Not applicable
Ready-to-eat sandwich meats Examples include ham, salami, and luncheon and luncheon-type meats.	Not applicable	Saturated fat ≤ 2g/100g Sodium ≤ 1090mg/100g	Saturated fat > 2g/100g Sodium > 1090mg/100g
Sausages, frankfurters and saveloys	Not applicable	Saturated fat ≤ 7.5g/100g Sodium ≤ 800mg/100g	Saturated fat > 7.5g/100g Sodium > 800mg/100g
Meat alternatives (vegetarian options) Examples include vegetarian 'meats' and 'sausages', nutmeat, falafel, tofu and tempeh.	Total fat ≤ 10g/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Sodium ≤ 800mg/100g	Sodium > 800mg/100g

Dried and canned peas, beans and lentils (pulses) Examples include lentils, split peas, chickpeas, red kidney beans, baked beans, canned bean mixes, and flavoured dried peas and beans.	No added fat	Saturated fat ≤ 5g/serve	Saturated fat > 5g/serve
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Product Category	Classification		
Mixed meal dishes	Everyday	Sometimes	Occasional
Mixed meal items Items that are a combination of foods from one or more food groups. These are promoted as standalone items that are consumed on their own or as the main item of a meal. Examples include pizza, pasta dishes including filled pasta, lasagne and macaroni cheese, sushi, calzones, hotdogs and hamburgers.	<i>Primary</i> Energy ≤ 800kj/100g Energy ≤ 1500kj/serve Saturated fat ≤ 3g/100g Sodium ≤ 350mg/100g Sodium ≤ 700mg/serve <i>Secondary</i> Energy ≤ 800kj/100g Energy ≤ 2000kj/serve Saturated fat ≤ 3g/100g Sodium ≤ 350mg/100g Sodium ≤ 700mg/serve	<i>Primary</i> Energy ≤ 1200kj/100g Energy ≤ 1800kj/serve Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g Sodium ≤ 800mg/serve <i>Secondary</i> Energy ≤ 1200kj/100g Energy ≤ 2200kj/serve Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g Sodium ≤ 800mg/serve	<i>Primary</i> Energy > 1200kj/100g Energy > 1800kj/serve Saturated fat > 5g/100g Sodium > 450mg/100g Sodium > 800mg/serve <i>Secondary</i> Energy > 1200kj/100g Energy > 2200kj/serve Saturated fat > 5g/100g Sodium > 450mg/100g Sodium > 800mg/serve
Soup All fresh, canned and powdered soups, soup mixes and chowders.	Saturated fat ≤ 1.5g/100ml Sodium ≤ 450mg/100ml Fibre ≥ 1g/100ml	Energy ≤ 1000kj/100ml Saturated fat ≤ 5g/100ml Sodium ≤ 450mg/100ml	Energy > 1000kj/100ml Saturated fat > 5g/100ml Sodium > 450mg/100ml
Filled sandwiches, rolls and wraps All filled bread, flavoured bread, flat bread and pita bread. Examples include sandwiches, filled rolls and wraps (such as those filled with salad or vegetables and lean meat).	Energy ≤ 1100kj/100g Energy ≤ 1500kj/serve Saturated fat ≤ 5g/serve Sodium ≤ 600mg/100g	Energy ≤ 1500kj/100g Energy ≤ 1800kj/serve Saturated fat ≤ 8g/serve Sodium ≤ 750mg/100g	Energy > 1500kj/100g Energy > 1800kj/serve Sat fat > 8g/serve Sodium > 750mg/100g
Pastry products Examples include savoury pies, sausage rolls, spring rolls, quiches and samosas.	Not applicable	Energy ≤ 1000kj/100g Energy ≤ 1500kj/serve Saturated fat ≤ 5g/100g Sodium ≤ 350mg/100g	Energy > 1000kj/100g Energy > 1500kj/serve Saturated fat > 5g/100g Sodium > 350mg/100g

Product Category	Classification		
Snack items	Everyday	Sometimes	Occasional
Milk-based snack foods Examples include yoghurt, custards, dairy desserts and creamed rice, and soy versions of these items.	Energy ≤ 600kJ/serve Saturated fat ≤ 1.5g/serve Total sugar ≤ 15g/100g	Energy ≤ 1000kJ/serve Saturated fat ≤ 3g/serve Total sugar ≤ 17g/100g	Energy > 1000kJ/serve Saturated fat > 3g/serve Total sugar > 17g/100ml
Sweet snack foods Examples include biscuits, bars, cereal bars and sweetened popcorn.	Not applicable	Energy ≤ 1900kJ/100g Energy ≤ 600kJ/serve Saturated fat ≤ 2g/serve Sodium ≤ 200mg/serve Fibre ≥ 1.0g/serve Total sugar ≤ 15g/serve	Energy > 1900kJ/100g Energy > 600kJ/serve Saturated fat > 2g/serve Sodium > 200mg/serve Fibre < 1.0g/serve Total sugar > 15g/serve
Savoury snack foods Examples include crackers, bars, chips, potato crisps (chippies), rice crackers and popcorn.	Not applicable	Energy ≤ 1800kJ/100g Energy ≤ 600kJ/serve Saturated fat ≤ 3g/serve Sodium ≤ 200mg/serve	Energy > 1800kJ/100g Energy > 600kJ/serve Saturated fat > 3g/serve Sodium > 200mg/serve
Baked snack foods Examples include cakes, pancakes, pikelets, iced buns, sweet and savoury muffins, scones and sweet pastries, for example, danish pastries and fruit pies. Excludes biscuits and pre-packaged bars.	Not applicable	Energy ≤ 1800kJ/100g Energy ≤ 900kJ/serve Saturated fat ≤ 3g/serve Sodium ≤ 450mg/serve for savoury and ≤ 300mg/serve for sweet Fibre ≥ 1.0g/serve Total sugar ≤ 25g/serve	Energy > 1800kJ/100g Energy > 900kJ/serve Saturated fat > 3g/serve Sodium > 450mg/serve for savoury and > 300mg/serve for sweet Fibre < 1.0g/serve Total sugar > 25g/serve
Dried fruit Any dried fruit sold as a mixture or sold separately.	Not applicable	Package size ≤ 30g Saturated fat ≤ 3g/serve	Package size > 30g Saturated fat > 3g/serve
Dried fruit, nut and seed mixtures Examples include any dried fruit and nut and/or seeds sold as a mixture or any nuts and/or seeds sold separately.	Package size ≤ 30g Saturated fat ≤ 3g/serve No added salt	Package size ≤ 30g Saturated fat ≤ 5g/serve Sodium ≤ 200mg/serve	Package size > 30g Saturated fat > 5g/serve Sodium > 200mg/serve

Vegetable and/or fruit derived products Examples include vegetable and/or fruit leathers and similar leather-type products, vegetable and/or fruit chips for example banana chips (excludes potato chips) and foods made with vegetable and/or fruit juice, paste or concentrate.	Not applicable	Package size ≤ 30g ≥ 95% vegetable and/or fruit Saturated fat ≤ 3g/serve	Package size > 30g < 95% vegetable and/or fruit Saturated fat > 3g/serve
Ice creams, iceblocks, frozen yoghurts and jellies Ices, iceblocks, ice creams, frozen yoghurts, gelato, slushees, fruit and jelly tubs, and jelly snacks.	Not applicable	Energy ≤ 600kJ/serve Saturated fat ≤ 3g/serve Total sugar ≤ 20g/100g	Energy > 600kJ/serve Saturated fat > 3g/serve Total sugar > 20g/serve

Product Category	Classification		
Fat & Oil Products	Everyday	Sometimes	Occasional
Edible Oil Spreads	Not applicable	Saturated fat and Trans fat ≤28% of total fats Trans fat < 1% of total fats Sodium ≤ 400mg/100g	Saturated fat and Trans fat >28% of total fats Trans fat >1% of total fats Sodium > 400mg/100g

Food and Beverage Classification System

Nutrient Framework for Early Childhood Education Services

Occasional foods

There are certain foods that automatically fall into the occasional category due to these foods being too high in energy and/or saturated fat and/or added sugar and/or sodium and provide minimal nutritional value.

For early childhood education (ECE) children these food and beverages are:

1. confectionery¹
2. deep-fried foods
3. full-sugar and artificially sweetened energy drinks²
4. full-sugar and artificially sweetened carbonated beverages
5. flavoured water, fortified water and sports drinks³.

There are other foods and beverages that are not recommended for children and young people. These are any foods and beverages labelled with “not recommended for children”, coffee flavoured foods and beverages, and any food or beverage labelled “dietary supplement”.

Notes:

- This ECE framework is for children aged 1–5 years only.
 - For children aged 0–1 years, refer to the Ministry of Health’s Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2).
 - Products must meet all criteria to be classified as either everyday or sometimes.
 - The symbol > means greater than.
 - The symbol < means less than.
 - The symbol ≥ means greater than or equal to.
 - The symbol ≤ means less than or equal to.
-
1. Confectionery includes a range of sugar-based products, including boiled sweets (hard glasses), fatty emulsions (toffees and caramels), soft crystalline products (fudges), fully crystalline products (fondants), gels (gums, pastilles, and jellies), and chocolate.
 2. An energy drink is a non-alcoholic water-based flavoured beverage which contains caffeine and may contain carbohydrates, amino acids, vitamins and other substances, including other foods, for the purpose of enhancing mental performance.
 3. A sports drink (electrolyte drink) is a drink formulated and represented as suitable for the rapid replacement of fluid, carbohydrates, electrolytes and minerals.

Product Category	Classification		
Beverages [#]	Everyday	Sometimes	Occasional
Water Includes carbonated water.	All plain water with nothing added	Not applicable	Not applicable
Vegetable and/or fruit juice and drinks (children aged 2–5 yrs⁺) Examples include pure juices, fruit flavoured drinks and fruit smoothies.	Not applicable	Not applicable unless diluted. See catering guidelines	Undiluted vegetable and/or fruit juice and drinks
Pre-diluted fruit juices 50% or more dilution	Not applicable	Package size ≤ 350ml No added sugar	Package size > 350ml
Flavoured milks and drinking yoghurts (children aged 2–5 yrs^{+^}) Examples include flavoured cow's milk, soy milk and rice milk. Includes solid/frozen varieties.	Not applicable	Serving size ≤ 250ml Energy ≤ 300kJ/100ml Total fat ≤ 3.3g/100ml Total sugar ≤ 10g/100ml	Serving size > 250ml Energy > 300kJ/100ml Total fat > 3.3g/100ml Total sugar > 10g/100ml
Milk[*] (children aged 1–2 yrs) Examples include plain cow's, goat's and soy milks.	Total fat ≥ 3.3g/100ml	Not applicable	Not applicable
Milk^{*^} (children aged 2–5 yrs) Examples include plain cow's, goat's and soy milks.	Total fat 0.5 – 3.3g/100ml	Total fat > 3.3g/100ml	Not applicable

[#] Products with a package size ≥ 1.8 litres are considered multi-serve products and are for catering purposes only.

Multi-serve products should not be directly sold or provided to children.

^{*} Excludes cream. For recommendations on the use of cream see the catering guidelines.

[^] Introduction of reduced fat milks to children over 2 years of age is encouraged.

⁺ The Ministry of Health Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2) recommend breast milk, whole cow's milk and water as suitable sources of fluid in the diet of 1–2 year olds. Fruit juices, fruit drinks and other sweetened drinks are not recommended for infants and toddlers (0–2 years old).

Flavoured and fortified water: A carbonated or non-carbonated water-based flavoured beverage that may or may not contain added vitamins and/or minerals, prepared from one or more of the following: water, fruit extracts and sugars.

Fruit juice: The liquid portion, with or without pulp, obtained from fruit including products that have been concentrated and later reconstituted with water to a concentration consistent with that of the undiluted juice from which it was made. No more than 40g/kg of sugars may be added to juices.

Fruit drink: A product prepared from one or more of the following; fruit juice, fruit purée, concentrated fruit juice, concentrated fruit purée, comminuted fruit, orange peel extract, water, mineralised water, and sugars. Fruit drinks must contain no less than 50mL/L of fruit, except in the case of passionfruit drink, which must contain no less than 35mL/L of passionfruit.

Product Category	Classification		
Vegetables and fruit	Everyday	Sometimes	Occasional
Fresh, canned and frozen vegetables and/or vegetable mixes Excludes potato, kumara, taro and tapioca.	No added fat	Saturated fat ≤ 1.5g/100g	Saturated fat > 1.5g/100g
Potato, kumara, taro and tapioca Examples include fresh, frozen or mashed potato, kumara, taro and/or tapioca products.	No added fat No added salt	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 450mg/100g
Fresh, frozen and canned fruit, fruit tubs including fruit and jelly and puréed fruit	≥ 85% fruit content* No added fat No added salt No artificial sweetener or ≥ 60% fruit content* No added fat No added salt No added sugar^ or artificial sweetener	All other fresh, frozen and canned fruit ≥ 50% fruit content* for fruit tubs	< 50% fruit content* for fruit tubs

* Fruit content includes whole fruit, fruit pieces and fruit purée

^ Added sugar includes concentrated, refined and deionised fruit juice

Product Category	Classification		
Breads and cereals	Everyday	Sometimes	Occasional
Rice, pasta, noodles and couscous Examples include fresh and dried pasta, rice, couscous, noodle cups/instant noodles, rice risotto and savoury rice, and canned spaghetti.	No added fat No added salt	Energy ≤ 1000kJ/100g Saturated fat ≤ 1.5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 1.5g/100g Sodium > 450mg/100g

Breads or bread products and fruit breads Examples include all wholemeal, wholegrain, multigrain and white breads, muffin splits, crumpets, bagels, wraps, flat breads, rolls, fruit breads, non-iced buns, rewena bread, fa'apapa, garlic bread and croissants.	Saturated fat ≤ 1.5g/100g Sodium ≤ 450mg/100g Fibre ≥ 3g/100g	Saturated fat ≤ 4g/100g	Saturated fat > 4g/100g
Breakfast cereals Examples include wheat biscuits, bran, rice and cornflakes and bubbles, rolled oats and muesli.	Saturated fat ≤ 1.5g/100g Sugar ≤ 15g/100g (≤ 20g/100g for cereals containing fruit) Sodium ≤ 450mg/100g Fibre ≥ 8g/100g	Saturated fat ≤ 4g/100g Sugar ≤ 20g/100g (≤ 25g/100g for cereals containing fruit) Sodium ≤ 600mg/100g Fibre ≥ 4g/100g	Saturated fat > 4g/100g Sugar > 20g/100g (> 25g/100g for cereals containing fruit) Sodium > 600mg/100g Fibre < 4g/100g

Product Category	Classification		
Milk and milk products	Everyday	Sometimes	Occasional
Cheese Soft and hard cheese. Examples include ricotta, cottage cheese, cheddar, cheese slices and cream cheese.	All cheeses	Not applicable	Not applicable
Milk-based foods except cheese Examples include yoghurt, custards, dairy desserts, creamed rice, frozen dairy products including ice-cream and frozen yoghurt. and sov	Energy ≤ 1000kj/100g Energy ≤ 700kj/serve Saturated fat ≤ 3g/100g Total sugar ≤ 17g/100g	Energy > 1000kj/100g Saturated fat ≤ 5g/100g	Saturated fat > 5g/100g
Milk* (children aged 1–2 yrs) Examples include plain cow's, goat's and soy milks.	Total fat ≥ 3.3g/100ml	Not applicable	Not applicable
Milk*^ (children aged 2–5 yrs) Examples include plain cow's, goat's and soy milks.	Total fat 0.5 – 3.3g/100ml	Total fat > 3.3g/100ml	Not applicable

Flavoured milks and drinking yoghurts (children aged 2–5 yrs[#]) Examples include flavoured cow's milk, soy milk and rice milk. Includes solid/frozen varieties.	Not applicable	Serving size ≤ 250ml Energy ≤ 300kJ/100ml Total fat ≤ 3.3g/100ml Total sugar ≤ 10g/100ml	Serving size > 250ml Energy > 300kJ/100ml Total fat > 3.3g/100ml Total sugar >10g/100ml
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* Excludes cream. For recommendations on the use of cream see the catering guidelines.

^ Introduction of reduced fat milks to children over 2 years of age is encouraged.

The Ministry of Health Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2) recommend breast milk, whole cow's milk and water as suitable sources of fluid in the diet of 1–2 year olds. Fruit juices, fruit drinks and other sweetened drinks are not recommended for infants and toddlers (0–2 years old).

Product Category	Classification		
Meat, fish, seafood, poultry and meat alternatives	Everyday	Sometimes	Occasional
Fresh, frozen, canned and pouched fish and seafood Examples include plain fish fillets and plain and flavoured canned and pouched tuna.	No added fat No added oil Sodium ≤ 500mg/100g	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 500mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 500mg/100g
Processed meat, fish, poultry and seafood products Examples include mince meat patties, crumbed or coated poultry and fish, fish patties, fish fingers, surimi, and other processed seafood.	Not applicable	Energy ≤ 1000kJ/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Energy > 1000kJ/100g Saturated fat > 5g/100g Sodium > 450mg/100g
Meat, poultry and eggs Examples include plain beef, lamb, pork, chicken and turkey, plain mince (with no added ingredients) and egg dishes.	Visibly lean, unprocessed meat and poultry Eggs cooked with no added fat and no added salt	All other unprocessed meat and poultry and egg dishes	Not applicable
Ready-to-eat sandwich meats Examples include ham, salami, luncheon and luncheon-type meats.	Not applicable	Saturated fat ≤ 2g/100g Sodium ≤ 1090mg/100g	Saturated fat > 2g/100g Sodium > 1090mg/100g

Sausages, frankfurters and saveloys	Not applicable	Saturated fat ≤ 7.5g/100g Sodium ≤ 800mg/100g	Saturated fat > 7.5g/100g Sodium > 800mg/100g
Meat alternatives (vegetarian options) Examples include vegetarian 'meats' and 'sausages', nutmeat, falafel, tofu and tempeh.	Total fat ≤ 10g/100g Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g	Sodium ≤ 800mg/100g	Sodium > 800mg/100g
Dried and canned peas, beans and lentils (pulses) Examples include lentils, split peas, chickpeas, red kidney beans, baked beans, canned bean mixes, and flavoured dried peas and beans.	No added fat	Saturated fat ≤ 5g/serve	Saturated fat > 5g/serve

Product Category	Classification		
Mixed meal dishes	Everyday	Sometimes	Occasional
Mixed meal items Items that are a combination of foods from one or more food groups. These are promoted as stand-alone items that are consumed on their own or as the main item of a meal. Examples include pizza, pasta dishes including filled pasta, lasagne and macaroni cheese, sushi, calzones, hotdogs and hamburgers.	Energy ≤ 800kJ/100g Energy ≤ 1500kJ/serve Saturated fat ≤ 3g/100g Sodium ≤ 350mg/100g Sodium ≤ 700mg/serve	Energy ≤ 1200kJ/100g Energy ≤ 1800kJ/serve Saturated fat ≤ 5g/100g Sodium ≤ 450mg/100g Sodium ≤ 800mg/serve	Energy > 1200kJ/100g Energy > 1800kJ/serve Saturated fat > 5g/100g Sodium > 450mg/100g Sodium > 800mg/serve
Soup All fresh, canned and powdered soups, soup mixes and chowders.	Saturated fat ≤ 1.5g/100ml Sodium ≤ 450mg/100ml Fibre ≥ 1g/100ml	Energy ≤ 1000kJ/100ml Saturated fat ≤ 5g/100ml Sodium ≤ 450mg/100ml	Energy > 1000kJ/100ml Saturated fat > 5g/100ml Sodium > 450mg/100ml

Filled sandwiches, rolls and wraps All filled bread, flavoured bread, flat bread and pita bread. Examples include sandwiches, filled rolls and wraps (such as those filled with salad or vegetables and lean meat).	Energy ≤ 1100kJ/100g Energy ≤ 1500kJ/serve Saturated fat ≤ 5g/serve Sodium ≤ 600mg/100g	Energy ≤ 1500kJ/100g Energy ≤ 1800kJ/serve Saturated fat ≤ 8g/serve Sodium ≤ 750mg/100g	Energy > 1500kJ/100g Energy > 1800kJ/serve Saturated fat > 8g/serve Sodium > 750mg/100g
Pastry products Examples include savoury pies, sausage rolls, spring rolls, quiches and samosas.	Not applicable	Energy ≤ 1000kJ/100g Energy ≤ 1500kJ/serve Saturated fat ≤ 5g/100g Sodium ≤ 350mg/100g	Energy > 1000kJ/100g Energy > 1500kJ/serve Saturated fat > 5g/100g Sodium > 350mg/100g

Product Category	Classification		
Snack items	Everyday	Sometimes	Occasional
Sweet snack foods Examples include biscuits, bars, cereal bars and sweetened popcorn.	Not applicable	Energy ≤ 1900kJ/100g Energy ≤ 600kJ/serve Saturated fat ≤ 2g/serve Sodium ≤ 200mg/serve Total sugar ≤ 15g/serve	Energy > 1900kJ/100g Energy > 600kJ/serve Saturated fat > 2g/serve Sodium > 200mg/serve Total sugar > 15g/serve
Savoury snack foods Examples include crackers, bars, chips, potato crisps (chippies), rice crackers and popcorn.	Not applicable	Energy ≤ 1800kJ/100g Energy ≤ 600kJ/serve Saturated fat ≤ 3g/serve Sodium ≤ 200mg/serve	Energy > 1800kJ/100g Energy > 600kJ/serve Saturated fat > 3g/serve Sodium > 200mg/serve
Baked snack foods Examples include cakes, pancakes, pikelets, iced buns, sweet and savoury muffins, scones and sweet pastries, for example, danish pastries and fruit pies. Excludes biscuits and pre-packaged bars.	Not applicable	Energy ≤ 1800kJ/100g Energy ≤ 900kJ/serve Saturated fat ≤ 3g/serve Sodium ≤ 450mg/serve for savoury and ≤300mg/serve for sweet Fibre ≥ 1.0g/serve Total sugar ≤25g/serve	Energy > 1800kJ/100g Energy > 900kJ/serve Saturated fat > 3g/serve Sodium > 450mg/serve for savoury and > 300mg/serve for sweet Fibre < 1.0g/serve Total sugar > 25g/serve
Dried fruit Any dried fruit sold as a mixture or sold separately.	Not applicable	Package size ≤ 30g Saturated fat ≤ 3g/serve	Package size > 30g Saturated fat > 3g/serve

Vegetable and/or fruit derived products Examples include vegetable and/or fruit leathers and similar leather-type products, vegetable and/or fruit chips for example banana chips (excludes potato chips) and foods made with vegetable and/or fruit juice, paste or concentrate.	Not applicable	Package size \leq 30g \geq 95% vegetable and/or fruit Saturated fat \leq 3g/serve	Package size $>$ 30g $<$ 95% vegetable and/or fruit Saturated fat $>$ 3g/serve
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Product Category	Classification		
Fat & Oil Products	Everyday	Sometimes	Occasional
Edible Oil Spreads	Not applicable	Saturated fat and Trans fat \leq 28% of total fats Trans fat $<$ 1% of total fats Sodium \leq 400mg/100g	Saturated fat and Trans fat $>$ 28% of total fats Trans fat $>$ 1% of total fats Sodium $>$ 400mg/100g