



Food Standards Australia New Zealand Consultation Paper – Labelling Review
Recommendation 17: Per serving declarations in the nutrition information panel.

March 2015

A. Overview

Lion welcomes the opportunity to provide comment on the **Food Standards Australia New Zealand (FSANZ) Consultation Paper – Labelling Review Recommendation 17: Per serving declarations in the nutrition information panel.**

Recommendation 17 states: “the declaration in the nutrition information panel of the amount of nutrients per serve be **no longer mandatory** – unless a daily intake claim is made (e.g. front of pack labelling; vitamin/mineral nutrition content claim).

The intent of this Recommendation is to ‘simplify’ the NIP for the relevant stakeholders.

B. Company Profile

Lion is a leading beverage and food company with a portfolio that includes many of Australia and New Zealand’s favourite brands.

Lion employs more than 7,000 people across Australia and New Zealand predominantly, as well as Hong Kong, Malaysia, Singapore and the US, and takes great pride in its local manufacturing footprint, which spans over 35 sites across the Tasman – encompassing large breweries, craft breweries, wineries, dairy farms, milk, cheese, yoghurt and juice sites as well as hospitality venues.

There are four business units within the Lion business – Beer, Spirits and Wine Australia; Beer, Spirits and Wine New Zealand; Lion Dairy & Drinks (including The Daily Drinks Company (juice/ drinks) and Lion Asia Dairy.

Lion is one of the region's largest purchasers of agricultural goods and an integral component of the retail, hospitality and tourism industries, with a total direct plus indirect contribution to the Australian and New Zealand economies estimated at more than \$5 billion annually.

Lion builds marketplace success from the foundations of great people and great brands, with a portfolio of household-name brands such as Tooheys, Dairy Farmers, Steinlager, Tasmanian Heritage, XXXX, PURA, Hahn, Berri, Speight’s, King Island Dairy, James Boag & Son, Dare, Yoplait, Wither Hills, St Hallett and COON.

In 2014, Lion Dairy launched the Goodness Project – a Lion initiative committed to improving the health and wellbeing of Australians by bringing more natural goodness to every Australian every day.

The [Goodness Project](#) is a holistic program considering the Lion Dairy and Drinks product portfolio (reformulation and inherent goodness); sourcing of ingredients; product availability; and, labelling

and consumer education. Specific targets over the next five years will deliver significant reductions in salt, sugar and fat content, as well as artificial colours, flavours and added fructose in our children's products. Lion Dairy and Drinks will also apply the Health Star Rating front of pack labelling system to 100% of the portfolio by 2018.

C. Overall Position and Recommendations

Lion is committed to providing consumers with nutrition product information to enable informed product choices, aligned with public health recommendations – such as the Australian Dietary Guidelines.

We support retaining the status quo, with 'per serve' (and 'per 100g/mL') information remaining mandatory in the nutrition information panel (NIP) on products – until convincing evidence is presented otherwise.

Whilst we acknowledge potential benefits on international harmonisation and reducing regulatory requirements, there is currently no convincing evidence a problem exists with the 'per serve' information being in the NIP, nor evidence removal of this information would not have a negative impact on stakeholders.

Lion calls for efforts to be focused on delivering a co-ordinated, cross-functional education program involving government, consumer groups and industry to help consumers understand the Australian and New Zealand Dietary Guidelines and how to put them into practice.

This program needs to be underpinned by sound research that broadly assesses how nutrition product information is best provided to stakeholders (e.g. consumers; health educators), to maximise its use and understanding. The product label is only one tool in this mix.

The nutrition information 'per serve' and 'per 100g/mL' provides stakeholders with 'consistent-foundation' product information from which nutrition and health claims, front of pack labelling, and education messages can result.

'Per serve' information provides stakeholders with 'guidance' on how much they should realistically be consuming in one eating or drinking occasion, as part of a balanced diet – whether the product is sold as a single serve, bulk-pack or multi-pack. Work is underway by the food and beverage industry to better align serve sizes within food and beverage categories.

The 'per serve' information also underpins a number of public health and government recommendations including the Australian Dietary Guidelines/Australian Guide to Healthy Eating; the National Health and Medical Research Councils Standard Serve Guidelines for Alcohol; consumer weight management programs such as 'Weight Watchers'; Quick Service Restaurant Education Programs on 8700kJ; School Canteen Policies; and, Survey data such as the Australian Health Survey.

Consumers and health educators need to trust the product information available to them. Providing nutrition information 'per 100g/mL' only, could result in them questioning the integrity of manufacturers, and accusing them of hiding information, rather than being open and transparent.

As part of Recommendation 17, a 'general statement on serving size' will be included on pack –

although excluded from this round of consultation (page 69, Blewett Labelling Logic Review, 2011). This means, regardless of whether ‘per serve’ information in the NIP becomes voluntary, ‘serving size’ details will still appear somewhere on pack.

Removal of the ‘per serve’ information in the NIP, would mean stakeholders need to have the skill and inclination to calculate what a serve equates to – for example, multiplying up or down to calculate the energy/nutrient content for a 20g slice of cheese, or a 500mL chocolate flavoured milk.

These points are further discussed below.

D. Responses to the Questions

Lion has prepared the following responses to the nine questions in the Consultation Paper:

Q1	How do you or your organisation use per serving information in the nutrition information panel on food labels?
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Lion uses the information in the NIP for a number of purposes, including:

Audience	Use
Employees, Distributors, Consumers, Customers	<ul style="list-style-type: none"> Product development – ‘realistic’ serve sizes (single serve, bulk-pack, multi-packs)
	<ul style="list-style-type: none"> Development and validation of nutrition content claims and health claims
	<ul style="list-style-type: none"> Advisory statements on pack, e.g. alcohol/ number of standard drinks per serve; caffeine content per serve
	<ul style="list-style-type: none"> Front of pack labelling – Lion Dairy and Drinks has committed to providing per serve energy information (including percentage daily intake) front of pack, in addition to the Health Star Rating
	<ul style="list-style-type: none"> Health and Wellness Strategies, e.g. the Lion Dairy and Drinks Goodness Project – the nutrient criteria used to classify products within the Goodness Project is calculated per 100g/mL and per serve (see ‘Company Profile’ for an explanation of the Goodness Project)
	<ul style="list-style-type: none"> Nutrition Education and Capability Programs, e.g. Lion nutrition education programs that teach our employees about label reading, and the energy and nutrients in our foods and beverages
	<ul style="list-style-type: none"> Nutrition Education Resources, e.g. Lion fact sheets, websites, schools/ product registration and classification information sheets (e.g. green, amber, red)
	<ul style="list-style-type: none"> Internal Policies and Procedures, e.g. Labelling; Nutrition and Health Claims; Serve/Portion Size Guidelines
	<ul style="list-style-type: none"> Consumer messaging – serves of dairy; serves of fruit (fruit juice); alcohol and

	standard drinks; “less than 100 calories per serve”; converting serve messaging into practical household measures – e.g. a 250mL glass of milk; a 40g handful of cheese.
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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.

Per serving information assists in product development and education across the entire Lion portfolio. Some specific examples include:

- Dairy – communication on the number of serves of dairy (aligned with the Australian Dietary Guidelines/ Australian Guide to Healthy Eating)
- Fruit juice – communication on the number of serves of fruit (aligned with the Australian Dietary Guidelines/ Australian Guide to Healthy Eating)
- Dairy beverage – voluntary declaration of caffeine content per individual serve
- Beer, Spirits and Wine – single serve/ number of standard drinks per serve.

Per serving information is useful in conveying nutrition information for:

- A single serve (e.g. beverage – juice, milk, fruit drink, beer, wine), bulk-pack (e.g. cheese, yoghurt, wine), and
- Multi-packs (e.g. yoghurt).

It is particularly useful for educating consumers, and minimising the risk of them being misled on products with either a smaller or larger serving size than ‘per 100g/mL’, e.g. a 20g slice of cheese; a 500mL chocolate flavoured milk; a 250mL bottle of juice.

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.

Lion supports ‘per serve size’ information remaining a mandatory part of the NIP, regardless of whether a daily intake claim is made or not – until convincing evidence is presented otherwise.

The purpose of the daily intake information is to help guide the consumers on what a product is contributing to their whole diet and to their (average) daily energy and nutrient requirements. This can help them understand whether more or less energy or nutrients are needed to meet their average daily requirements for health and wellbeing.

Maintaining the 'per serve' (and 'per 100g/mL) as mandatory information within the NIP, promotes consistency of information to the consumer and translation into practical terms and allows for simpler interpretation.

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?

'Per serve' (and 'per 100g/mL) information in the NIP should remain mandatory to best support consumers making informed product choices, providing consistency within and between product categories – until convincing evidence is presented otherwise.

As long as this 'foundation' information is consistently included in the NIP, additional 'voluntary' information – such as percentage daily intake labelling – should further facilitate product understanding and usage.

The Heart Foundation Tick, the GI symbol or the Gluten Free symbol are other examples of voluntary information that can enhance consumers understanding of a product.

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.

Lion supports 'per serve size' information remaining a mandatory part of the NIP, regardless of whether a nutrition content claim is made or not.

'Per serving' information for nutrition content claims, allows validation of the claim being made by the relevant stakeholders.

It also promotes consistency of information for consumers, allowing comparisons within and between product categories. It provides an important education tool for consumers. It facilitates trust, and supports the provision of transparency of product information to the consumer.

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.

Lion supports 'per serve size' information remaining a mandatory part of the NIP – until convincing evidence is presented otherwise.

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.

Convincing stakeholder research is needed before any labelling recommendations – additions or deletions – are proposed. This needs to be part of a broader piece of research that assess how nutrition product information should best be presented to stakeholders to enable practical recommendations from the Dietary Guidelines to flow into whole foods and balanced diets being consumed. The product label is only one tool in this mix.

Learning's from the Heart Foundation Tick, the GI Symbol, the Health Star Rating front of pack labelling system, along with the Australian Food and Grocery Councils Daily Intake Guide, should be included as part of this research.

Studies on the numeracy skills in multi-ethnic communities would also be useful, to understand their ability to calculate from 'per 100g/mL' to 'per serve'.

This research would then enable a focused, co-ordinated, cross-functional education program to be delivered, involving government, consumer groups and industry, to help consumers understand the Australian and New Zealand Dietary Guidelines and how to put them into practice.

Other references to note:

- Nutrition labels on pre-packaged foods: a systematic review
<http://www.ncbi.nlm.nih.gov/pubmed/21241532>
- Health Canada: Consumer Research <http://www.hc-sc.gc.ca/fn-an/label-etiquet/modernize-report-moderniser-rapport-eng.php>
- [Lion Consumer Research on front of pack labelling and the Health Star Rating \(January 2015\):](#)
 - Methodology: quantitative and qualitative research involving a nationally representative sample of over 1000 participants, that explored the role of nutrition information on pack; their reactions to the Health Star Rating; and their preferred Health Star Rating device.
 - Consumers generally check nutrition information when they are buying new products versus 'staple' items. There are signs the underlying health trends are driving more frequent checking of nutrition information.
 - 'Per serving': consumers require meaningful quantification as to what constitutes a serve – it's an easy reckoner if based on 'average daily serve amounts'. There was a desire for 'per serve' to state the 'average serve' size based on weight or volume for recommended healthy consumption and be illustrated using practical measures such as cups, spoons or handfuls.
 - Consumer sentiment:

- “It’s (per mL) difficult sometimes, it depends on the size of the product”.
 - “It can get tricky sometimes with the per serve, because you read that, but then there will be three serves in a packet”.
 - “I feel like the percentage is a bit more relatable, the percentage of daily intake – you can understand it”.
- ‘Front of pack labelling’: When ranking their preference for front of pack labelling information, over 50% of participants preferred the Health Star Rating along with energy per 100g/mL and energy per serve:
 - Consumer sentiment:
 - “Because it shows how many kJ per 100mL and per 250mL serve. Comparisons can be calculated with this information”.
 - “It’s good that it has the daily intake percentage, if you have that and the per serve, then I think that’s best”.

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.

Lion provides responses to the advantages and disadvantages of ‘per serve’ information being ‘voluntary’ in the NIP, but retains supports for ‘per serve size’ remaining a mandatory part of the NIP until convincing evidence is presented otherwise.

Advantages/ Disadvantages	Comments
<u>Advantages</u> – Having ‘per serve’ information as voluntary in the NIP	• Provides a ‘simplified looking’ NIP
	• May increase the available space on pack
	• International harmonisation: <ul style="list-style-type: none"> - EU: require information per 100g/mL. Portion/ consumption unit is optional - Codex (note: per serve is optional. Where countries use serving size information as standard, NIP information may be presented as ‘serve only)
	• If a product has a ‘serve’ or ‘pack size’ of 100g/mL, this information could appear once – currently needs to appear twice
<u>Disadvantages</u> – Having ‘per	• Serve size is a useful tool for the consumer, helping to educate on the role of foods and beverages as part of their whole diet and daily intake:

Advantages/ Disadvantages	Comments
serve' information as voluntary in the NIP	<ul style="list-style-type: none"> - Supports learning on what a 'realistic' serve size is - Aligns with public health needs to educate consumers on food and beverages as part of a balanced diet, and assist in the prevention and management of communicable disease – such as obesity
	<ul style="list-style-type: none"> • Inconsistent information and format for the consumer, allowing comparisons within and between product categories
	<ul style="list-style-type: none"> • Alcohol: the majority are sold in 'single serve' format; government guidelines and messaging are for numbers of standard drinks
	<ul style="list-style-type: none"> • Government and NGO materials reference serving sizes: e.g. Australian Dietary Guidelines; Australian Guide to Healthy Eating; NMHRC Alcohol Guidelines; Australian National and State/ Territory Schools canteen criteria; NZ Fuelled for Life classification system for schools; National Heart Foundation Tick criteria; GI symbol program; Quick Service Restaurant and the 8700kJ program
	<ul style="list-style-type: none"> • Consumer programs reference per serving: Weight Watchers point system; Michelle Bridges – 100 calories (per serve)
	<ul style="list-style-type: none"> • International harmonisation: <ul style="list-style-type: none"> - Canada and USA (note: 100g/mL is voluntary) - Codex – for single serve pack (note: 'per serve' is optional. However, where countries use serving size information as standard, NIP information may be presented as 'serve only')
	<ul style="list-style-type: none"> • The AFGC front of pack Daily Intake Guide system (based on 'per serve') was introduced in 2006/2007. • The Health Star Rating system – information may also appear 'per serve'
	<ul style="list-style-type: none"> • Listing information 'per 100g/mL' will require a consumer to calculate how much of a product they are consuming, and what this means in terms of their whole diet and daily intake
	<ul style="list-style-type: none"> • Misleading to provide the consumer with product information for per 100g/mL only. For example a 20g slice of cheese; a 375mL bottle of beer; a 500mL flavoured milk; a 250mL bottle of juice; a bottle of wine • Impact consumers trust and desire for transparency of product information

Advantages/ Disadvantages	Comments
	<ul style="list-style-type: none"> Impact health educators ability to educate their clients on how to interpret food labels and make healthier choices aligned with public health recommendations

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.


No. Lion supports 'per serve size' information remaining a mandatory part of the NIP – until convincing evidence is presented otherwise.

This promotes consistency of information for consumers, allowing comparisons within and between product categories. It provides an important education tool for consumers. It facilitates trust, and supports the provision of transparency of product information to the consumer.

Lion is committed to providing consumers with appropriate nutrition product information to make informed product choices, aligned with public health recommendations.

Yours sincerely




Group Nutrition Manager – Regulation and Strategy.