



**Grains &  
Legumes  
Nutrition  
Council**

*Cultivating Good Health*

## **Grains & Legumes Nutrition Council**

### **Submission**

### **Labelling Review Recommendation 17: Per Serving Declarations in the Nutrition Information Panel**

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## PREFACE

This submission has been prepared by Grains & Legumes Nutrition Council™ (GLNC), the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- GrainGrowers
- Bakers Delight
- Campbell Arnott's
- H.J. Heinz Company Australia
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- UniGrain
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia

## CONTENTS

PREFACE .....	2
INTRODUCTION .....	4
STAKEHOLDER VIEWS AND EVIDENCE .....	5
Question 1 .....	5
Question 2 .....	5
Question 3 .....	5
Question 4 .....	6
Question 5 .....	7
Question 6 .....	8
Question 7 .....	8
Question 8 .....	9
Question 9 .....	9
ADDITIONAL RECOMMENDATION .....	10
REFERENCES .....	10

## INTRODUCTION

The Grains & Legumes Nutrition Council (GLNC) appreciates the opportunity to respond to the consultation on Labelling Review Recommendation 17: Per Serving Declarations in the Nutrition Information Panel (NIP).

GLNC does not support Recommendation 17 that the amount of nutrients per serve in the NIP be no longer mandatory. GLNC recommends that, pending a full review of nutrition labelling, per serving nutrition information should remain as a mandatory inclusion in the NIP for all foods. The GLNC position relates only to grain and legume foods available on shelf to consumers and not foods supplied to the food service industry or used as part of a meal. Some GLNC Contributors produce products beyond this scope and consequently their position on this issue may differ to GLNC when taking into account their entire product portfolio.

GLNC is conscious that with the introduction of new regulations and front-of-pack labelling schemes consumer use and understanding of the NIP may be changing. In light of this GLNC believes the recommendation to remove the requirement for mandatory per serve labelling does not take into account the broader context of nutrition labelling. GLNC recommends a full review of the of how nutrition information is presented to consumers including the drivers for serve size use, consumer choices, and the use of the NIP across different categories such as food service and ingredients as well as ready to eat foods.

GLNC notes that the body of evidence on which to make recommendations is limited and would like to see further research into labelling which supports consumers to make healthy food choices. GLNC welcomes the planned FSANZ literature review on consumer use and understanding of per serve information. However, GLNC believes this should be done as part of a full review of nutrition labelling and be included in any public consultation on changes to the NIP.

GLNC is aware variation in recommended serve sizes may create concerns about consumer understanding of the NIP. GLNC is currently working with the grains and legumes industry towards agreement for consistent messaging on recommended serve sizes that reflect the portions commonly eaten.

The following GLNC submission is structured to answer the stakeholder questions provided in the consultation document.

## STAKEHOLDER VIEWS AND EVIDENCE

### Question 1

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

In line with the Australian Dietary Guidelines, GLNC encourages Australians to choose better quality grain foods including whole grain, high fibre and low GI. For example, GLNC promotes the daily fibre intake of 25g for men and 30g for women. The per serve information is an important tool to help people determine their daily intake of fibre and allows them to assess the contribution of a serve of food to their fibre intake.

GLNC also encourages Australians to choose only occasionally those foods higher in sugar, salt and fat. Per serve information helps people choose foods that contribute less to their total sat, fat and sugar intake.

### Question 2

***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.***

GLNC believes that per serving information is useful in all on shelf grain and legume categories. The per serve information is particularly important for food products intended to be eaten as packaged rather than those used as an ingredient in cooking.

### Question 3

***Do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary? Why/why not?***

GLNC does not support the recommendation that per serving information be voluntary.

### Rationale

The key objective of the NIP is to provide people with factual information to allow them to make an informed decision. Removal of the nutrients per serve information in the NIP undermines this objective by making it more difficult for people to make a decision based on the information on pack.

GLNC considers that both per serve and per 100g data is relevant information as the purpose of the NIP is to allow comparison between products as well as allow assessment of the food to provide essential nutrients in the diet. While the per 100g information may allow the comparison between foods within a category, it does not allow a person to easily assess the adequacy of a serve of the food in providing essential nutrients. While serve sizes do not always reflect portion sizes, providing per serve information allows a person to assess if they would usually eat more or less of a food and then estimate the amount of essential nutrients in a usual portion. Determination from per 100g information would require a calculation which is potentially beyond the ability of a large segment of the population. Thus removal of the nutrients per serve information in the NIP would effectively remove important information about the actual nutrients provided by a serve of the food.

GLNC is concerned that the requirement for a statement of recommended serve size or number of serves per pack has not been addressed in Recommendation 17. If per serve information is removed from the NIP, a food manufacturer may choose to remove the related recommended serve size.

GLNC notes the importance of retaining recommended serving size and number of serves stated on the NIP to guide consumers on appropriate portion sizes. Consumers may not be aware of the recommended serving size and if this information is not available on pack it could lead to overconsumption. Even if the food is considered healthy by Front-of-Pack labelling schemes such as the Health Star Rating System it can still be over consumed if no guidance is given to how much should be consumed. In a consumer research project of breakfast cereal consumers, 71% indicated they use the recommended serve size to guide how much to eat at least half the time (51% usually or always). In addition, 65% responded they would like to see the number of serves in a pack displayed on front of pack.<sup>1</sup>

#### **Question 4**

***The Labelling Review recommendation suggests that per serving information be voluntary unless a daily intake claim is made. Do you support this approach? Why/why not?***

GLNC does not support the recommendation that per serving information be voluntary. GLNC believes per serving information in the NIP should be mandatory regardless of whether a daily intake claim is made. In the case that per serving information is made voluntary, GLNC supports the recommendation that per serving information be compulsory when a daily intake claim is made.

#### **Rationale**

The purpose of a daily intake claim is to help people understand the contribution of a serving of food to their whole diet. However, if per serving information is not listed on packaging the daily intake claim is provided without context i.e. it would be difficult for many people to calculate the amount of the nutrient provided in one serve using the per 100g information.

The position of GLNC is based on the evidence presented in the FSANZ consultation document which suggests at least half of Australians use per serving information to choose foods, as listed below.

Section 7.3 Consumer use and understanding of per serving information (p13 – 14):

“...the per serving column was viewed as providing information on the nutrient amounts that the person would actually consume.”<sup>2</sup>

“...Australian and New Zealand research participants were more likely to use the per serving information than the per 100g/100mL information (50% use compared to 39% use) (Scott et al. 1999).”<sup>3</sup>

“Participants were more likely to use the per serving column both for making judgements about a single food and for comparing two foods.”<sup>4</sup>

“...when asked to choose the healthier product based on two snack food NIPs, where the serving size was the same, 54% reported that they mainly used the per serving column. Only 30% reported using the per 100g/100mL column.”<sup>5</sup>

GLNC recommends further research is conducted into the use of the serve size column in context of the Health Star Rating (HSR) Front-of-Pack labelling scheme, including in conjunction with daily intake claims. GLNC notes that as industry adopts the Health Star Rating system it is likely they may discontinue the use of daily intake front of pack labelling. As a result per serve information may not be provided as widely over time. This will lead to less per serve labelling.

## Question 5

***What does your organisation consider are the advantages and disadvantages of per serving information in the nutrition information panel being voluntary?***

GLNC is not aware of any literature to suggest there are any public health advantages to allowing the nutrient per serving information in the NIP to be voluntary.

GLNC believes there are a number of disadvantages to voluntary inclusion of per serving information in the NIP which undermine the public health benefit of the NIP.

### **Rationale**

Firstly, it has the potential to create confusion as some products will carry the information and others will not. People are unlikely to understand the nuance that the foods that carry a daily intake, nutrition content or health claim are the foods that must show the per serve information. The most likely result will be frustration amongst consumers in not being able to compare the values between products and a lack of engagement with the NIP.

Secondly, the potential absence of the nutrient per serving information in the NIP will make it more difficult for people to determine the amount of essential nutrients they can expect in a serve of the food. This hampers their ability to follow the advice of health care professionals to choose foods that will help them achieve recommended intakes of nutrients such as fibre. In addition, public health initiatives encouraging people to achieve particular targets for energy intake or intake of either positive or negative nutrients rely on readily available information about amount of energy or nutrients per serve. For example, the goal of the successful NSW Department of Health 8700kJ campaign is to educate consumers around the recommended daily energy intake of 8700kJ. If the energy content of the food is not provided on a per serve basis, it would make it very difficult for consumers to track their daily energy intakes.

In comparison, per serve information allows easy nutrient comparison between foods which have a different recommended serve sizes due to factors such as moisture contents or food formats. Per 100g information does allow easy understanding of these differences. For example, foods that are low in moisture and have a smaller serve size may not compare favourably with foods within the same category which are higher moisture and have a larger serve size.

Taking fibre as an example, while one food may have more fibre per 100g than another the other attributes, such as energy density or food format, result in lower fibre content per recommended serve size. For example, wholemeal wraps and bread have similar fibre content per 100g of 6.3 – 6.5g. However, the amount of fibre in the suggested serve size on pack is significantly different with a wrap containing only 1.2g of fibre and 2 slices of bread containing 3.5g. A similar disparity can be seen when the products are compared based on the serve sizes recommended in the Australian Dietary Guidelines (Table 1).

**Table 1. Amount of fibre per 100g and per serve in foods within bread and breakfast cereal categories.**

Food	Fibre per 100g	Fibre per suggested serve (recommended serve)	Fibre per Australian Dietary Guideline serve size (serve size)
Wholemeal wrap	6.3g	1.2g (1 wrap)	0.6g (1/2 wrap)
Wholemeal bread	6.5g	3.5g (2 slices)	1.7g (1 slice)
Oat based breakfast cereal	9.5g	2.8g (30g serve)	2.4g (25g)
Flaked breakfast	8.9g	4g (45g serve)	2.7g (30g)

cereal			
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Reference: FoodWorks 2010

Table 2 demonstrates the same issue with comparison of foods commonly eaten at breakfast. When comparing protein per 100g, Nutri-Grain appears to have more protein than yoghurt. However when compared per serve, they are similar (8.7g/40g serve and 10.2g/200g respectively). When comparing sugars, Nutri-Grain again appears to have more sugar, however when compared per serve Nutri Grain actually has less sugar per serve than the yoghurt (12.8g/40g and 31.6g/200g respectively).

**Table 2. . Amount of NIP nutrients per 100g and per serve in foods in the breakfast category.**

	Weet Bix per 100g	Nutri Grain per 100g	Up & Go per 100g	Yoghurt Reduced fat, vanilla per 100g	Egg per 100g
Energy (kJ)	1490	1600	329	403	594
Protein (g)	12.4	21.9	3.3	5.1	12.8
Fat - total (g)	1.3	0.6	1.5	1.7	10.1
Tat - saturated (g)	0.3	0.1	0.2	1.1	3.1
CHO – total (g)	67	69.4	12.1	15.8	0.3
- sugars (g)	3.3	32	7.6	15.8	0.3
Dietary fibre (g)	11	2.7	1.5	0	0
Sodium (mg)	270	480	65	68	133

## Question 6

*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?*

GLNC believes that the variability in the format of NIPs across the food supply created by voluntary per serving information in the NIP would increase confusion amongst consumers and undermine public health messages and health care professional guidance.

As stated in the response to question 3, GLNC believes the variability in the format of the NIP across the food supply is a key issue.

## Question 7

*Qualifying criteria for nutrition content claims about vitamins, minerals, dietary fibre, omega-3 fatty acids and protein set out in Schedule 1 of Standard 1.2.7 are based on per serving amounts. 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.*

GLNC does not support the recommendation that per serving information be voluntary. GLNC believes per serving information in the NIP should be mandatory regardless of whether a nutrition content claim is made.



However, in the case that per serving information is made voluntary, GLNC supports the recommendation that per serving recommendation be compulsory when a nutrition content claim is made.

### **Rationale**

As demonstrated in the response to Question 3, the fibre levels in serves of foods in the same category can differ significantly. Consequently, if a person is seeking to validate nutrition content claims by looking at the NIP it is important the information is readily available. For nutrient content claims based on per serving amounts, if per serve information were not provided this would create consumer confusion and would impact any education campaigns around nutrient content and health claims.

Fortification regulations stipulate that the addition of vitamins and minerals be calculated as percentage of Recommended Daily Intake (%RDI) per serve. If the fortificant content and the corresponding %RDI per serve were not provided, it is likely that the NIP information (i.e. quantity of vit/min per 100g) would be quite meaningless to most consumers.

### **Question 8**

***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.***

In the case that per serving information is made voluntary, GLNC believes per serving information be compulsory when a general level or high level health claim is made that relates to the amount of a specific nutrient. For example, the Food Standards Code Standard 1.2.7 allows the use of the health claim 'beta-glucan reduces blood cholesterol' with the condition the food contain at least 1g beta-glucan per serve. This is based on the evidence that an intake of 3g of beta-glucan across the day reduces cholesterol. Any food making this statement should be required to include per serving information in the NIP to allow consumers to validate the claim and track the amount of beta-glucan they have eaten.

### **Question 9**

***Does your organisation hold any consumer information you would be prepared to share with FSANZ on consumer research related to understanding and use of NIPs? What do these studies show?***

In a survey of 524 Australians in February 2015 (main grocery buyers, female, predominantly breakfast cereal consumers), 95% indicated the NIP impacted their purchasing decisions. In this group the per serve information was actively sought out and used as frequently as the per 100g information, but for different reasons.<sup>1</sup>

Overall, there was a high awareness of the per serve information on the NIP (96%). When asked about the use of specific parts of the NIP, 42% indicated they use the per serve information compared to 47% who use the per 100g information. The frequency of using the per serve information is similar to the frequency of NIP usage, with 56% using the information when they buy a new product, and 29% reporting they use it every time they shop. Open-ended responses indicated people reporting using the per 100g information do so because the recommended serve sizes do not match their portion size. Respondents using per serve information reported using the information as a guide to how much of a nutrient is in a portion when 100g is not a realistic portion.

## ADDITIONAL RECOMMENDATION

### Full policy review

GLNC is conscious that with the introduction of new regulations and front-of-pack labelling schemes consumer use and understanding of the NIP may be changing. In light of this GLNC recommends a full review of the of how nutrition information is presented to consumers including the drivers for serve size use, consumer choices, and the use of the NIP across different categories such as food service and ingredients as well as ready to eat foods.

## REFERENCES

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