

FSANZ

02 February 2015

## **Submission**

### **Recommendation 17: Per serving declarations in the nutrition information panel**

#### **From: Southern District Health Board Clinical Dietitians**

We are concerned about the above recommendation to remove the 'per serving' column as mandatory unless a nutrient claim is made. Although this may simplify the appearance of the nutrition panel we believe that for many consumers this will make life a lot less simple. We work with a wide variety of people with different conditions on which nutrition impacts. Some of these are highlighted below.

#### **Diabetes- Type 1 and type 2.**

Diabetes Mellitus is a chronic condition which is increasing in incidence. While the 100g column provides good information for comparing products to make healthy choices at the store, the per serving column is used every day at meals and snacks. Most of our type 1 diabetes and some of our type 2 diabetes patients are now taught carbohydrate counting to manage their blood sugars. This enables the person to adjust their insulin medication to their lifestyle and make the most of the insulins we have available today. Adjusting insulin to their carbohydrate intake usually improves glycaemic control but it can also make a big difference to the person's quality of life i.e. kids can eat more freely at birthday parties, all can eat to their appetite, rather than following a 'diet plan'. There is also often a reduction in hypoglycaemia (very low blood glucose levels requiring intervention to treat) as insulin is better matched to intake. Pharmac now funds insulin pumps for some patients and in Dunedin we have started over 100 patients on pumps within the last two years. A pre-requisite to obtaining a pump is to be carbohydrate counting.

Although we have carb counting books the best source of information for these people is the nutrition panel. From this they can compare what they are having to the serving size and easily work out how much carbohydrate they are about to eat or have just eaten. This then tells them how much insulin they need to deal with that carbohydrate. Most times patients are instructed to look at the per serving column as this is most practical for them.

For example; Eating 4 crackers. The per serving column says there is 12g of carbohydrate in a serving of 2 crackers. Total carb = 24g. My insulin to carb ratio is 1:8, Therefore I need 3 units of insulin.

If only the per 100g column was available in most instances they would have to use scales to work out how much carbohydrate they are eating. It is not practical to carry food scales around with you. As it is, insulin pens and glucose meters are enough of a burden. Many patients new to carbohydrate counting are initially fearful that it will be too hard to learn or understand but are usually pleasantly surprised at how simple it is, using the information available. However, if the per serving column was not available I think this would add an extra level of learning that would put many off. The other source of nutrition information for our patient which is growing is the use of websites and apps. However, these often rely on uploads of information from other consumers or companies and so will likely lack the per serving information going forth if it was removed.

### **Pregnancy**

Food choices during pregnancy are important for the mother and developing infant. Women with diabetes in pregnancy are taught how to use nutrition information including the per serve and the per 100g information to support healthier food choices, and also to adjust portions and or medication to achieve even tighter blood glucose targets.

### **Eating Disorders (from our mental health dietitian)**

I instruct this client group in use of both per serving and per 100g product. Per 100g is good for comparing like products and educating on nutrient/energy content of total product. Whereas removal of per serving column would;

- Challenge methods of educating this and other client groups, e.g. adequate calcium intake, just add up Ca according to number of dairy servings using per serving column.
- Clients often use it as a guide to how many servings a package contains, often not stated on the packaging elsewhere.
- It is helpful with meal planning, budgeting and shopping.
- Per serving is a useful consumer guide for nutrient intake, nutritional analysis and recording/reporting of daily food intake.
- It would make using an App more mathematically challenging if it was taken off packaging.

### **Obesity/Overweight/Weight gain on medications**

As for eating disorders