

Submission on: Labelling Review Recommendation17

The recommendation is: that the daily declaration in the nutrient information panel (NIP) of amount of nutrients per serving be no longer mandatory unless a daily intake claim is made

Question 1:

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

- Education of parents, family, caregivers of children, and children about the specific nutrient content of a serve e.g. fat, carbohydrate, salt/Na, sugar.

For children with medical conditions such as cystic fibrosis (CF) and diabetes the nutrient per serve information is used to calculate medication dose

- e.g. in CF to see the fat content of the serve size and/ or individual packet, to calculate the correct dose of pancreatic enzyme for the amount of fat eaten in that serve size
- e.g. in diabetes to see the total carbohydrate content of the food serving size, to calculate the correct dose of insulin
- e.g. in renal disease To assess suitability of food based on salt content
- To compare different products' serving size to find the most nutritionally appropriate choice e.g. crackers with the lowest salt per serve, cereals with high fibre per serve, fat or sugars per serve
- Nutrition education resources for patient education of commonly eaten foods and serving sizes

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.

Per serving is useful for all products

e.g. Breakfast cereals -a ½ cup or 1 cup serve is a meaningful and easily visualised serve.
100 g of cereal does not help the consumer judge how their own serve size compares
Muesli bars
Individual packets of potato chips, nuts e.g. 18 g packet,
Yoghurt

- Per serve information tells you what nutrients are in that serve
- Food is eaten in different serving size amounts, not in 100 g amounts

- People have no concept of what 100 grams of the product looks like
e.g. 100 g of potato chips is a huge amount compared with the individual serve packet that contains 18 g
- A label serving size is an average. Serve size can teach / show what an average serve is for that product. This is important for general public nutrition information and obesity prevention. One of the reasons for obesity is large serving size.
- Per serve information is used to calculate pancreatic enzyme dose and insulin dose to match the nutrient content of the amount of food eaten in that packet / serve size.
- A packet can contain more than one serving, so the per serve quantity shows how many serves in the packet and also the analysis of the serve.

Question 3:

The Labelling Review recommendation suggests that per serving information be voluntary *unless a daily intake claim is made*.

- Do **NOT** support recommendation that per serving information be voluntary in any situation
- DI values are based on USA adult references, not NZ NRV's
- DI values are confusing, cannot tell from the DI what the amounts are per serve
- If you really want to check you are getting enough of a nutrient using DI values i.e. have reached 100%, you would only be able to eat packaged food as it is labelled, yet a healthier diet includes lots of fruit and vegetables which do not have nutrient labelling. Therefore DIs encourage a less than optimal, more processed diet.
- Not relevant or helpful for children as requirements vary with age and are not the same as adult requirements.

Question 4:

As noted in Section 4, 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?

- Do not see a need for DI % labelling which will also help to decrease the amount of space required for information on the label.
- More variation, different numbers and percentages is more confusing
- Labels need to be consistent with a per serve and per 100 g labelling
- If one product has a per serve label but another product has a 100grams label, the consumer cannot compare the two easily, it requires a calculator. Thus healthier food choices will be more difficult.

See also answers to Question 5

Question 5:

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 answers.

Per serving information should be mandatory for the major macronutrients of energy, protein, fat, carbohydrate, sugars **and** any other nutrient if a nutrition claim is made about a single nutrient.

Information about only one nutrient can be misleading e.g. a fruit drink which has ascorbic acid as a preservative increases the vitamin C content and could be labelled as having 2x RDI for vitamin C, but if it does not have to include the macronutrients it will not be clear it also has (for example) 4 teaspoons of sugar per serve.

Foods contain a number of nutrients and consumers need to be able to easily compare a number of different things at once.

Focus groups show the need for both a per serve and per 100 g analysis e.g. a serving size given helps show that the packet size contains a **number** of average serves.

Per 100 g analysis gives a guide to the nutrient quality of a product with macronutrients, sugar, fibre and salt and allows easy comparison of two similar products, but does not inform you how much you will actually be getting in a single serve.

The actual quantity of a single serve is at the manufacturer's discretion and may not be a similar size between two similar foods. However, per serving size information is also required at the same time, to enable the consumer to relate the information to an actual serve size of food eaten.

Question 6:

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.

Per serving information needs to be mandatory for all foods. See reasons above.

Question 7:

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.

Unable to comment about consumer studies. However as dietitians we work with consumers daily educating on nutrition and healthy food choices, and they readily understand the per serve information, but not the DI information.

The Ministry of Health's Food and Nutrition Guidelines are taught on a food serving size basis. Consumers can then relate these serves to a serve listed on the packet to see how it compares with a recommended amount.

Serving size on labels can help educate about appropriate portion sizes. This is very important with an obesity epidemic where serving sizes are getting larger.

Anecdotal feedback from a mother of a child with cystic fibrosis, who uses food label serving sizes and content to calculate the pancreatic enzyme (Creon) dose - "relies on the per serve column to find out the fat content of that food and amount to work out Creon required. Important for other caregivers to correctly calculate the Creon dose for foods they are not familiar with".

Question 8:

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:

- None

Disadvantages:

- Some manufacturers will chose not to put it on, saying it takes more space on label, however it barely takes up any more space.
- Consumers will not be able to make an educated / informed choice about nutrients in the food they eat, as they will not be able to understand how the 100g information relates to a serving size i.e. the amount they eat
- People **do not** stop to use a calculator in the supermarket to work out the nutrient content of a serving size when buying a food and choosing between brands

There are medical consequences and harmful effects if the fat content and the carbohydrate content of food eaten is not accurately known, from the incorrect pancreatic enzyme doses and incorrect insulin doses given.

For cystic fibrosis if the fat content of the food serve is not specified on a label an incorrect dose of pancreatic enzyme will be given. If too large an amount of the enzyme is given – this can result in abdominal pain, constipation and bowel obstruction. If an inadequate amount of the enzyme is given, this can result in malabsorption of the food, nutrients, weight loss / poor weight gain and growth.

If the amount of carbohydrate eaten in a food is under-estimated – inadequate insulin is given which leads to elevated blood glucose levels and hyperglycaemia. If the carbohydrate amount is over-estimated the insulin dose given will be too great and can result in hypoglycaemia (low blood glucose). Both low and high blood glucose levels can have serious and life threatening consequences.

Question 9:

Do you think the declaration of the amount of energy and nutrients per serving in the NIP should be voluntary?

No it should not be voluntary, it should remain compulsory.

Yours sincerely

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