

Australian Avocado Nutrition submission:

Consultation Paper – Labelling Review Recommendation 17:

Per serving declarations in the nutrition information panel

DEADLINE FOR SUBMISSIONS: 6pm (Canberra time) 13 February 2015

Introduction

Australian Avocado Nutrition is a nutrition education program from Avocados Australia and Horticulture Innovation Australia. Our aim is to educate health professionals and food regulators about the health benefits of regular avocado consumption.

We appreciate this opportunity to comment and provide the following answers to the questions raised in the consultation paper.

Question for Submitters

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

We use the per serving column in nutrition information panels (NIPs) on our website and fact sheets. As a fresh produce item generally sold individually, NIPs are not found on product. Although occasionally small avocados made be sold in multi packs.
The per serving column aids our efforts in highlighting the serving size for an avocado ie ¼-½ of an avocado and the nutrients that this serve contains eg a source of healthy fats, fibre, vitamins C and E and folate.

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.*

Not for the Avocado Industry

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.

The per serving information is useful any time a nutrient content claim is made including %DI. It is useful to know what nutrients are in a serve of the food and use the per 100g column in NIPs for making comparisons between food products when shopping.
Many people are not numeracy literate and would find it difficult to calculate the nutrients in a portion of food from the per 100g column or understand the percent Daily Intake levels.

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?*

Consistency in the design of NIPs is needed to make it easier for consumers to understand and interpret the data in the nutrition information panels.

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.*

The per serving column should remain mandatory as substantiation for nutrient content claims. Many of these claims have nutrient criteria set per serve (Standard 1.2.7) eg fibre claims – to make a “source of” fibre claim need to have a minimum 2g fibre per serve not per 100g.

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.*

We are not aware of any other specific regulatory situations

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.*

We are not aware of any studies

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 of voluntary - should not be mandatory

Disadvantages of voluntary – should be mandatory

Consumers would not be able to easily determine the quantity of nutrients they are consuming in a serve of food such as avocado if they only have the per 100g column available. The per serving column makes those calculations for them.

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.

It is the view of Australian Avocado Nutrition that the per serving column in NIPs should remain mandatory and not voluntary as it helps the industry promote a specific serving size and substantiates the nutrient content claims we make for healthy fats, fibre and folate. A per serving column also provides consumers with nutrient levels without the need for calculations. There are many members of the community that would be interested in knowing a particular nutrient level per serve eg pregnant women looking for 400ug of folate, patients with chronic diseases to manage eg diabetes.

This response is submitted by [REDACTED] Advanced Accredited Practising Dietitian on behalf of Australian Avocado Nutrition

For more information please contact:

Name: [REDACTED]

Organisation/Background: Australian Avocado Nutrition – Consultant Dietitian

Phone no: [REDACTED]

Email: [REDACTED]