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Dear Gillian

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Healthy Food Partnership voluntary best practice guide for serving sizes – public consultation*.

Yours sincerely

Katherine Rich
Chief Executive



Healthy Food Partnership voluntary best practice guide for serving sizes – public consultation

Submission by the New Zealand Food & Grocery Council

4 August 2021

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the Australian *Healthy Food Partnership voluntary best practice guide for serving sizes – public consultation*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. The two-way trade between Australia and New Zealand has continued to grow over the last two decades. Australia is a major market for New Zealand and according to Austrade¹ the New Zealand retail market is valued at \$15 billion to the Australian food sector. Addressing the potential for unintended trade barriers and continuing to strengthen that trade is a priority for New Zealand. Continued vigilance in this area is important and even a voluntary program such as the Healthy Food Partnership Voluntary Best Practice Guide for serving sizes is an important development for New Zealand. Knowledge sharing and harmonisation are integral to these activities and underpin the NZFGC’s interest in contributing to the Survey currently open for public consultation.

Part A – Serving size Goals

Serving Size Goals

Q1. Do you support portion guidance and serving size goals as a complementary public health measure? Why, why not? Please provide evidence ...

4. Serve sizes have most recently been included in the updated (December 2020) New Zealand Ministry of Health *Eating and Activity Guidelines for New Zealand Adults* and it is important that alignment is achieved where possible. Separately, NZFGC is aligned with the Australian Industry Group – Confectionery Sector in work around consumer awareness and portion sizes for confectionery.
5. We support the HFP Industry Serving Size work and the Best Practice Guide for Industries Serving Sizes. Any complementarity that the Australian Government might apply is also supported.

1. Cakes, Muffins, Slices: Retail

Q1.1 Do you agree with the definition of this category? Is there anything that needs to be added/deleted?

Category Definition:

Ready-to-eat freshly baked, frozen or shelf-stable cakes, muffins and slices sold in retail settings. Excludes packet baking mixes.

Contains three sub-categories:

Sub-category A: Cakes

Ready-to-eat freshly baked, frozen or shelf-stable cakes sold in retail. Includes cake sold whole or pre-portioned (with or without toppings), or cupcakes with a frosting or a coating. Excludes packet baking mixes.

Sub-category B: Muffins

¹ [Food and beverage - New Zealand - For Australian exporters - Austrade](#)

Ready-to-eat freshly baked, frozen or shelf-stable muffins with or without a light topping (e.g. crumbs, dusted with icing sugar, chocolate drizzle), sold in retail in pre-portioned servings. Excludes packet baking mixes.

Sub-category C: Slices

Ready-to-eat freshly baked, frozen or shelf-stable slices sold in retail. Excludes packet baking mixes. Slices are a sweet product typically consisting of layers, with a firm base (such as biscuit), and a topping (such as icing or chocolate), with or without a filling.

6. No, **Sub-category A: Cakes** needs to make clear that the category also includes cupcakes without without a frosting or a coating.

Sub-category C: Slices needs to be clear that savoury slices are not intended to be captured and reference on where these are captured in the guidance.

Q1.2 Are you aware of any technical constraints to reducing the serving size?

7. Yes - Individual companies will advise in this area.

Q1.3 Are there other concerns or challenges with reducing the serving size of this category?

8. Yes, In the current Covid environment, every change to products and product packaging needs to be considered in terms of ingredient and materials supply. international trade routes and deliveries are constantly challenged. As well, careful scrutiny of change has to be assessed in terms of waste and sustainability. Time is the greatest factor for both exacerbating the challenges (delivery etc) and reducing cost (planned and lengthy transitions).

Q1.4 Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?

9. No.

Q1.5 What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance? Please provide examples of case studies/initiatives. Examples may be used in the guidance document to provide real world practical advice

10. NZFGC members (which include many trans Tasman companies) have actively addressed serving sizes aligned with relevant dietary guidelines. The importance of trans-Tasman alignment is reflected in the efforts across both countries.

2. Cakes, Muffins, Slices: Out of Home Sector

11. N/A

3. Chocolate and chocolate-based confectionery: Retail sector

The recommended (maximum) serving size for this category is 50g.

This applies to single consumption bars that are not portion controlled or portionable (i.e. single serve chocolate portions, chocolate bars for individual consumption in a single sitting). For multiserve products, defer to [existing industry guidance](#) i.e. 25g +/-5g and portionability criterion.

Q3.1 Do you agree with the definition of this category? Is there anything that needs to be added/deleted?

Category Definition:

Plain chocolate or chocolate-based confectionery, including all chocolate varieties (white, milk or dark chocolate) sold in the retail setting. Excludes cooking chocolate.

12. In part. We consider it important to add 'compounded chocolate' and 'ruby chocolate'. Compounded chocolate is a style of confectionery that may be used as a substitute for chocolate.

Q3.2. *What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance?*

13. NZFGC has the New Zealand copyright to use the same Be Treatwise consumer information to help explain the place confectionery has, as a treat food, in a healthy, balanced diet and active lifestyle.
14. *Be treatwise*, together with its associated tagline '*Enjoy a balanced diet*', is a 'front of pack' message to consumers to treat confectionery mindfully. The *Be treatwise* logo is displayed with energy per serving and where possible a serving size descriptor.
15. In other areas, the changes that manufacturers have made in Australia including in the confectionery sector to make changes to deliver smaller portions have also generally been reflected in New Zealand.
16. Responsible advertising has featured in the New Zealand market as it has in Australia with a voluntary Code for advertising food to children and young people developed and overseen by the New Zealand Advertising Standards Authority. We also share the industry guidance prepared by the AIG for confectionery manufacturers and would support consideration of reviewing or evolving that guidance to deliver an aligned guidance document for New Zealand.

Q3.3 *Are you aware of any technical constraints to reducing the serving size?*

17. Yes. NZFGC is aware that product reconfiguration to reduce serving size incurs cost on business due to technical constraints. Serving size/portion changes have flow on impacts through composition (such as research and development, ingredient ratios), production (such as unit retooling, plant reconfiguration, production scheduling) and packaging cycles (such as packaging adjustments, new artwork, labelling etc).

Q3.4 *Are there other concerns or challenges with reducing the serving size of this category?*

18. Yes. See response to Q1.3.

Q3.5 *Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?*

19. No.

5. Frozen desserts, ice-cream and ice-confection: Retail Sector

The questions on this page relate to the **Retail** sector.

The recommended (maximum) serving size for this category is 80g

Q5.1 *Do you agree with the definition of this category? Is there anything that needs to be added/deleted?*

Category definition:

Ready-to-eat frozen dairy- or dairy-alternative-based desserts and ice-confections sold in retail settings

20. Yes.

Q5.2. *What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance?*

21. In 2018, The New Zealand food industry (including supermarkets, fast food, restaurant etc sectors) joined to report to Government on measures that might address the factors contributing to obesity. This included recommendations relating to serve size.

22. Responsible advertising has featured in the New Zealand market as it has in Australia with a voluntary Code for advertising food to children and young people developed and overseen by the New Zealand Advertising Standards Authority. We also share the industry guidance prepared by the AIG for confectionery manufacturers and would support consideration of reviewing or evolving that guidance to deliver an aligned guidance document for New Zealand.

Q5.3 Are you aware of any technical constraints to reducing the serving size?

23. Yes. See response to Q3.3.

Q3.4 Are there other concerns or challenges with reducing the serving size of this category?

24. Yes. See response to Q1.3.

Q3.5 Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?

25. No.

6. Sweetened beverages: Out of home

The recommended (maximum) serving size for this category is

Q6.1 Do you agree with the definition of this category? Is there anything that needs to be added/deleted?

Category definition:

26. No. The definition should explicitly exclude sports drinks.

Q6.2. What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance?

27. In 2018, The New Zealand food industry (including supermarkets, fast food, restaurant etc sectors) joined to report to Government on measures that might address the factors contributing to obesity. This included recommendations relating to serve size.

28. Responsible advertising has featured in the New Zealand market as it has in Australia with a voluntary Code for advertising food to children and young people developed and overseen by the New Zealand Advertising Standards Authority. We also share the industry guidance prepared by the AIG for confectionery manufacturers and would support consideration of reviewing or evolving that guidance to deliver an aligned guidance document for New Zealand.

Q6.3 Are you aware of any technical constraints to reducing the serving size?

29. Yes. See response to Q3.3 as this also applies to equipment for the out-of-home sector.

Q6.4 Are there other concerns or challenges with reducing the serving size of this category?

30. Yes. See response to Q1.3.

Q6.5 Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?

31. No.

7. Pizza: Out of Home Sector

32. N/A

8. Potato: Out of Home Sector

33. N/A

9. Savoury pastry products, pies, rolls and envelopes: Out of home and Retail

The questions on this page relate to both the **Retail** and **Out of Home** sectors.

The recommended (maximum) serving size for this category is 200g

Q9.1 Do you agree with the definition of this category? Is there anything that needs to be added/deleted?

Category definition:

Meat, poultry and/or vegetable filing encased in a pastry and sold in the out of home and retail sectors

34. No, besides not encasing filings rather than fillings, there should be explicit reference to open top products.

Q9.2. What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance?

35. In 2018, The New Zealand food industry (including supermarkets, fast food, restaurant etc sectors) joined to report to Government on measures that might address the factors contributing to obesity. This included recommendations relating to serve size.

36. Responsible advertising has featured in the New Zealand market as it has in Australia with a voluntary Code for advertising food to children and young people developed and overseen by the New Zealand Advertising Standards Authority. We also share the industry guidance prepared by the AIG for confectionery manufacturers and would support consideration of reviewing or evolving that guidance to deliver an aligned guidance document for New Zealand.

Q9.3 Are you aware of any technical constraints to reducing the serving size?

37. Yes. See response to Q3.3 as this also applies to equipment for the out-of-home sector.

Q9.4 Are there other concerns or challenges with reducing the serving size of this category?

38. Yes. Yes. See response to the comparable question in the first category surveyed (response to Q1.3).

Q9.5 Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?

39. No.

10. Sweet Biscuits: Retail Sector

The questions on this page relate to the **Retail** sector. For the Serving Size recommendations for the **Out of Home** sector, please see the next question.

The recommended (maximum) serving size for this category is 30g

Q10.1 Do you agree with the definition of this category? Is there anything that needs to be added/deleted?

Category definition:

All sweet biscuits sold in retail. Includes products which are coated or uncoated, filled or unfilled. Excludes packet biscuit/cookie mixes and cookie doughs

40. Yes.

Q10.2. What have you or your company done in the past or are currently doing within this category in relation to portion or serving size guidance?

41. In 2018, The New Zealand food industry (including supermarkets, fast food, restaurant etc sectors) joined to report to Government on measures that might address the factors contributing to obesity. This included recommendations relating to serve size.

42. Responsible advertising has featured in the New Zealand market as it has in Australia with a voluntary Code for advertising food to children and young people developed and overseen by the New Zealand Advertising Standards Authority. We also share the industry guidance prepared by the AIG for confectionery manufacturers and would support consideration of reviewing or evolving that guidance to deliver an aligned guidance document for New Zealand.

Q10.3 Are you aware of any technical constraints to reducing the serving size?

43. Yes. See response to Q3.3 as this also applies to equipment for the out-of-home sector.

Q10.4 Are there other concerns or challenges with reducing the serving size of this category?

44. Yes. Yes. See response to the comparable question in the first category surveyed (response to Q1.3).

Q10.5 Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?

45. No.

Part B – Best Practice Guide

Two samples of the Industry Best Practice Guide are provided above. Please review the samples before answering the following questions ...

Q B1. What do you like about the two samples, with regards to the look, feel and layout?

46. The two example guides provided in the consultation, (1) muffin, cakes and slices and (2) savoury pastries are:

- Clear and easy to understand
- Good balance between graphics and text
- Real life images and relatable size suggestions eg ball, pack of cards, credit card
- Icons used consistently through the suite of guides
- Good layout, section delineation and use of white space
- Hyperlinked resources

Q B2. What would you change about the two examples, with regards to the look, feel and layout?

47. NZFGC would support the changes proposed by others including AIG as reflected in the following:

- Include brief rationale, as to why the guide is being established, for context
- Explain a discretionary food choice reference amount
- Ensure images correspond in weight to the size suggestions
- Consider size suggestions are compared to a metric measure, eg ruler, cup measure
- Explain discretionary serve size range, for example 1 = slices; 2.5 = muffins/cakes
- In the 'Need more help' section, call out and hyperlink to the definitions

Q B3. How helpful is it to have the following pieces of information displayed in the Guide?

48. The following are helpful:

- Category definition
- Serving size recommendation
- Tips & tricks – category specific
- Guiding principles for resizing

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- How to review the serving size information on labels of products
 - Case studies
 - Rationale for the serving size recommendation

49. Not supported is 'How to indicate a smaller serving size on pack'.

*Q B4. In what formats are you likely to access the Industry Best Practice Guide?
(Select all that apply)*

50. NZFGC supports 'View online' and 'Download and print out copies'.

Q B5. Which channels should be used to promote the Industry Best Practice Guide?

51. NZFGC supports the Healthy Food Partnership website, Public Health/NGO peak bodies, Industry peak bodies, Forums and, in terms of other avenues, we would support the use of networks such as professional dietitian, nutrition and food science and technology groups.

Part C - General Comments

Q C1. Do you have any additional general comments?

52. The Healthy Food Partnership (HFP) might consider complementary consumer education by raising awareness of appropriate dietary choices, quantity and frequency, the role of core food and beverage consumption, individual needs and requirements across the life course consistent with the dietary guidelines. Education and creating consumer awareness of confectionery have long been the hallmark of the industry's *Be treatwise* program in both Australia and New Zealand.