

# Healthy Food Partnership Voluntary Industry Best Practice Guide for Serving Sizes - Public Consultation

GLOBE response – 4 August 2021

## Part A - Serving size goals

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

Please select only one item

The Global Obesity Centre (GLOBE) aligns its responses with those of Cancer Council Australia.

We support, in principle, a move to encourage smaller portion and serving sizes as a measure that may reduce consumption of kilojoules and nutrients of public health concern such as saturated fats, sodium and added sugars. However, such guidance would require certain conditions in order to deliver meaningful public health benefit. This includes:

- corresponding reformulation targets for reducing kilojoule, saturated fats, sodium and added sugar content
- clear timeframes for implementation
- monitoring changes to the food supply
- reporting on uptake of the guidelines

The current proposal does not adequately address these issues and is likely to have minimal impact on public health.

This *Voluntary Industry Best Practice Guide for Serving Sizes* is for foods classified as discretionary foods in the Australian Dietary Guidelines. Consumption of these foods should be limited in order to maintain a healthy weight. The Dietary Guidelines state that “there is limited capacity for including energy-dense discretionary foods in nutritious dietary patterns within the energy requirements of many Australians”.<sup>1</sup> Yet Australians are eating too many discretionary foods. In 2011-12 over a third (35%) of total energy consumed by Australians was from discretionary foods. After alcoholic beverages, the foods listed in this consultation were the highest contributors proportionally.<sup>2</sup> The greatest public health impact would be achieved if people avoided these foods completely.

We note that the voluntary nature of the guidelines means that they are much less likely to result in meaningful population health benefits compared to mandatory standards. It can be challenging for industry to make changes when there is a risk that they could lose customers to a competitor. Mandatory standards would ensure a level playing field. At the very least there should be provisions to mandate the initiative unless there are significant uptake levels within a short timeframe (12 months).

---

<sup>1</sup> National Health and Medical Research Council, Department of Health. Australian Dietary Guidelines. Canberra; 2013. National Health and Medical Research Council.

<sup>2</sup> Australian Bureau of Statistics. Australian Health Survey: Nutrition First Results - Foods and Nutrients 2011-12. Australian Bureau of Statistics [Internet]. 2014 23/07/2021. Available from: <https://www.abs.gov.au/statistics/health/health-conditions-and-risks/australian-health-survey-nutrition-first-results-foods-and-nutrients/latest-release>

Public health initiatives must be based on best practice in order to achieve meaningful public health benefits. The Healthy Food Partnership (formerly the Food and Health Dialogue) has thus far not achieved significant improvements in improving the healthiness of the food supply, let alone meaningful public health benefit.<sup>3</sup>

In addition, monitoring and evaluation should be included in the development stages and therefore form part of this proposal, not be added on later.

The food manufacturing and services sector must take responsibility for removing excessive portion sizes from the market. The Australian Dietary Guidelines outline that an appropriate portion size for discretionary foods should provide no more than 600kJ. This should underpin all portions for discretionary snack foods and meals. A muffin that is equivalent to 4 discretionary serves, a single portion of French fries equivalent to 2.5 serves and 450 ml drinks (equivalent to 1.5 serves), as outlined in the guide, are far from best practice.

Excess bodyweight and poor diet contribute to a significant burden of non-communicable disease in Australia. In 2013, approximately 5% of cancer deaths (2329 people) and 5% of cancer cases (6714 people) were attributable to dietary factors and overweight or obesity was linked to 1990 deaths and 5371 cases.<sup>4</sup> To address the rates of overweight and obesity and poor diet, particularly low vegetable and wholegrain intake, Australians should be encouraged to eat more foods from the five food groups and limit their discretionary food consumption. Efforts should be focused on dramatically improving the food available and limiting the promotion of energy-dense, nutrient-poor foods so that Australian diets can improve. The guidance in this document appears will do little to reduce intake of excess kilojoules, added sugars, saturated fats and sodium and will provide limited benefit in reducing diet-related disease. It is also unlikely to address the primary problem with our food system – the proliferation and promotion of energy dense, nutrient poor foods.

We encourage government commitment to evidence-based initiatives to address unhealthy diets and obesity rates. This includes:

- Comprehensive regulation to protect children under 18 years from exposure to unhealthy food marketing,
- Mandating the Health Star Rating,
- Strengthening the Nutrition Content and Health Claims Standard,
- A sugar-sweetened beverage levy,
- Restricted promotion (including discounting and multi-buy offers) of unhealthy food and drinks, and increased promotion of healthy food options.

---

<sup>3</sup> Jones A, Magnusson R, Swinburn B, et al. Designing a Healthy Food Partnership: lessons from the Australian Food and Health Dialogue. *BMC Public Health*. 2016;16(1):651.

Elliott T, Trevena H, Sacks G, et al. A systematic interim assessment of the Australian Government's Food and Health Dialogue. *Medical Journal of Australia*. 2014;200(2):92-5.

Trevena H, Neal B, Dunford E, et al. An evaluation of the effects of the Australian Food and Health Dialogue targets on the sodium content of bread, breakfast cereals and processed meats. *Nutrients*; 2014;2014.

Coyle DH, Shahid M, Dunford EK, et al. Contribution of major food companies and their products to household dietary sodium purchases in Australia. *International Journal of Behavioral Nutrition and Physical Activity*. 2020;17(1):81.

Coyle D, Shahid M, Dunford E, et al. Estimating the potential impact of Australia's reformulation programme on households' sodium purchases. *BMJ Nutrition, Prevention & Health*. 2021:bmjnph-2020-000173.

Trevena H, Dunford E, Neal B, et al. The Australian Food and Health Dialogue - the implications of the sodium recommendation for pasta sauces. *Public Health Nutr*. 2014;17(7):1647-53.

<sup>4</sup> Wilson LF, Antonsson A, Green AC, et al. How many cancer cases and deaths are potentially preventable? Estimates for Australia in 2013. *International Journal of Cancer*. 2018;142(4):691-701

## Questions on each category.

11 Categories:

Cakes, muffins and slices (Retail sector), Cakes, muffins and slices (Out of Home Sector), Chocolate and chocolate-based confectionery (retail), Crumbed and battered proteins (Out of home), Frozen desserts and ice-cream (retail), Sweetened beverages (Out of home), Pizza (Out of home), Potato products (i.e. chips/fries) (Out of home), Savoury pastry products, pies, rolls, and envelopes (Out of home and retail), Sweet biscuits (Retail), Sweet biscuits (Out of home)

Respond to Q5 in all categories (Question 6 in Category 6 Sweetened beverages: Out of home).

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

Yes  No

The Australian Dietary Guidelines based the dietary modelling on a 600kJ serve size for discretionary foods and found that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The foods within this category are discretionary foods and, as such, serving sizes should align with the guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600kJ.

Additionally, references to consistency with State and Territory Government guidance implies widespread government endorsement or alignment with existing government policies when this is not the case. In some cases, the State and Territory guidance being referred to may not have been developed for this purpose. Any reference to State and Territory Government guidance in public documents should be clear about which jurisdictions it refers to and the purpose of the original guidance it is referring to.

### 1. Cakes, Muffins, Slices: 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 sizes for this category are:

- Cakes and Muffins - 90g
- Slices - 45g

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

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.

*Please select only one item*

 

If no, please provide detail.

We recommend packet baking mixes be included for each sub-category. Regardless of the need to bake these products at home, they still have a similar nutritional content to ready-to-eat products. Serving sizes should align with retail recommendations and give consumers practical advice on what those serving sizes look like.

**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?

Please provide examples of case studies/initiatives. Examples may be used in the guidance document to provide real world practical advice.

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

*Please select only one item*

 

If yes - please provide detail of the constraints and supporting evidence. If no – go to next question.

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

*Please select only one item*

 

If yes, please provide details and supporting evidence.

If yes, please explain whether these challenges can be overcome.

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

*Please select only one item*

 

If yes, please provide detail

The Australian Dietary Guidelines based the dietary modelling on a 600kJ serve size for discretionary foods and found that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The foods within this category are discretionary foods and as such serving sizes should align with the guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600kJ.

Additionally, references to consistency with State and Territory Government guidance implies widespread government endorsement or alignment with existing government policies when this is not the case. In some cases, the State and Territory guidance being referred to may not have been developed for this purpose. Any reference to State and Territory Government guidance in public documents should be clear about which jurisdictions it refers to and the purpose of the original guidance it is referring to.

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

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

The recommended (maximum) serving sizes for this category are:

- Cakes - 125g
- Muffins - 150g
- Slices - 90g

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

Category definition:

Freshly baked, frozen or shelf-stable cakes, muffins and slices sold in the out of home sector.

Contains three sub-categories:

Sub-category A: Cakes

Freshly baked, frozen or shelf-stable cakes sold in food service. Includes cake sold whole or pre-portioned (with or without toppings), or cupcakes with a frosting or a coating.

Sub-category B: Muffins

Freshly baked, frozen or shelf-stable muffins, with or without a light topping (e.g. crumbs, dusted with icing sugar, chocolate drizzle), sold in food service, in pre-portioned servings.

Sub-category C: Slices

Freshly baked, frozen or shelf-stable slices sold in food service. 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.

*Please select only one item*

 

If yes – go to next question.

If no – please provide detail.

**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?

Please provide examples of case studies/initiatives. Examples may be used in the guidance document to provide real world practical advice.

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

*Please select only one item*

 

If yes - please provide detail of the constraints and supporting evidence. If no – go to next question.

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

*Please select only one item*

 

If yes, please provide detail of the concern/challenges and supporting evidence.

The recommended maximum serving sizes are still very large. Almost all consumers would exceed discretionary serve recommendations with just one serving of a cake or muffin in these amounts. In line with policy of gradual reduction in serving size by 10% for consumer acceptance, we recommend planning further reductions, for example scheduling reductions of 10% every 2 years.

If yes, please explain whether these challenges can be overcome.

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

*Please select only one item*

 

If yes, please provide detail. If no – go to next question.

The Australian Dietary Guidelines based the dietary modelling on a 600kJ serve size for discretionary foods and found that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The foods within this category are discretionary foods and as such serving sizes should align with the guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600kJ.

Additionally, references to consistency with State and Territory Government guidance implies widespread government endorsement or alignment with existing government policies when this is not the case. In some cases, the State and Territory guidance being referred to may not have been developed for this purpose. Any reference to State and Territory Government guidance in public documents should be clear about which jurisdictions it refers to and the purpose of the original guidance it is referring to.

#### **4. Crumbed and battered proteins: Out of Home**

The questions on this page relate to the **Out of Home** sector.

The recommended (maximum) serving size for this category is 150g

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

 

We recommend the crumbed and battered protein target for out of home should also apply to the retail sector.

In addition, the serving size should be reduced to 120g which is equivalent to approximately 1.5 discretionary serves for crumbed fish. The 150g serving size currently exceeds the 66<sup>th</sup> percentile.

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

*Please select only one item*

 

If yes, please provide detail

The Australian Dietary Guidelines based the dietary modelling on a 600kJ serve size for discretionary foods and found that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The foods within this category are discretionary foods and as such serving sizes should align with the guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600kJ.

Additionally, references to consistency with State and Territory Government guidance implies widespread government endorsement or alignment with existing government policies when this is not the case. In some cases, the State and Territory guidance being referred to may not have been developed for this purpose. Any reference to State and Territory Government guidance in public documents should be clear about which jurisdictions it refers to and the purpose of the original guidance it is referring to.

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

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



We recommend the maximum serving size be reduced to 65g which is approximately a 10% reduction and brings it closer to 1.5 serves of discretionary food.

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

*Please select only one item*



If yes, please provide detail

The Australian Dietary Guidelines based the dietary modelling on a 600kJ serve size for discretionary foods and found that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The foods within this category are discretionary foods and as such serving sizes should align with the guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600kJ.

Additionally, references to consistency with State and Territory Government guidance implies widespread government endorsement or alignment with existing government policies when this is not the case. In some cases, the State and Territory guidance being referred to may not have been developed for this purpose. Any reference to State and Territory Government guidance in public documents should be clear about which jurisdictions it refers to and the purpose of the original guidance it is referring to.

## 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

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



We recommend packet baking mixes and cookie doughs be included in the definition. Regardless of the need to bake these products at home, they still have a similar nutritional content to ready-to-eat products. Serving sizes should align with retail recommendations and give consumers practical advice on what those serving sizes look like.

## Part B - Best Practice Guide

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

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

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

The statement “aligns with State and Territory Government Guidance” is misleading. It is referring to specific guidelines in two jurisdictions. And in some cases, it does not align exactly even though a reader would interpret it as doing so (e.g. NSW lists retail muffins as 80g while this current guide lists a retail muffin portion as 90g). Any reference in the Industry Best Practice Guide has to be an accurate claim i.e. the serve size guideline is exactly the same and also that it is clear it is only NSW and Victoria, for example “aligns with NSW guidance for health facilities and Victorian Healthy Choices Guide”, rather than the broad statement at present.

We do not agree with the term “Industry Best Practice Guide” as we have argued in Question 1, Part A that this is certainly not best practice.

In addition, we recommend against the use of the term “tricks” to describe the information for industry as this can imply deception or ways to work around the guidance.

2 How helpful is it to have the following pieces of information displayed in the Guide?

	Helpful	Neutral	Not helpful
<i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to review the serving size <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to indicate a smaller serving <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rationale for the serving size <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3 In what formats are you likely to access the Industry Best Practice Guide?

(Select all that apply)

*Please select all that apply*

4 Which channels should be used to promote the Industry Best Practice Guide?

*Please select all that apply*

Healthy Food Partnership website  Public Health/NGO peak bodies  Industry

peak bodies  Forums  Other, please specify below.

If other, please specify

## Part C - General Comments

1 Do you have any additional general comments?

Please attach a copy of any documents you wish to include to this printout.

If you would like to provide additional evidence to support your responses, please upload here.  
**Please attach a copy of any documents you wish to include to this printout**