

Healthy Food Partnership Voluntary Industry Best Practice Guide for Serving Sizes

**Response to consultation
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Recipient


Healthy Food Partnership, Department of Health
healthyfoodpartnership@health.gov.au

Dietitians Australia contact

Elizabeth World, Policy Officer
po1@dietitiansaustralia.org.au

A 1/8 Phipps Close, Deakin ACT 2600 | **T** 02 6189 1200
E info@dietitiansaustralia.org.au
W dietitiansaustralia.org.au | **ABN** 34 008 521 480

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8000 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for food and nutrition for healthier people and healthier communities. Dietitians Australia appreciates the opportunity to provide feedback to the Healthy Food Partnership regarding the draft Healthy Food Partnership Voluntary Industry Best Practice Guide for Serving Sizes.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in the food system to support consumers to identify healthier food options and companies with product formulation, marketing, consumer education and compliance.

This submission was prepared by members of the Dietitians Australia Food Regulatory and Policy Committee following the [Conflict of Interest Management Policy](#) and process approved by the Board of Dietitians Australia. Contributors include Dietitians Australia members with wide ranging expertise in areas including public health, food systems, food industry and academia.

Summary

Dietitians Australia supports portion guidance and serving size goals as a complementary public health measure, if accompanied by a transparent monitoring and evaluation plan. We have concerns about some serving size targets and recommend that all targets be at least 10% lower than the current 66th percentile size.

Portion guidance and serving size goals are a complementary measure and should not be standalone. Dietitians Australia calls on the government to commit to evidence-based initiatives to address unhealthy eating patterns in Australia. These include:

- Comprehensive regulation to protect children under 18 years from exposure to unhealthy food marketing
- Mandatory front of pack labelling scheme that promotes healthy food options
- Strengthening the Nutrition Content and Health Claims Standard
- A health levy on sugar-sweetened beverages
- Restricted promotion (including discounting and multi-buy offers) of unhealthy food and drinks, and increased promotion of healthy food options

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Part A – Serving size goals

1. Do you support portion guidance and serving size goals as a complementary public health measure?

Portion guidance and serving size goals are important elements to achieve good public health. The food system can be a significant enabler or inhibitor for everyday people to have healthy eating patterns. When people eat out of home or purchase treat foods from a retail outlet, they should be presented with reasonably portioned options that don't encourage consumption significantly above energy requirements. As identified in the rationale document, increasing portion and serving sizes are warping our sense of what 'reasonable' is, leading to eating above energy requirements and poor health outcomes.

A 2021 scenario analysis¹ of strategies to reduce consumption of discretionary foods and beverages in adults and children, based on Australian data, found that limiting the portion size of all discretionary items consumed to a maximum of 600kJ resulted in a significant 13.3% reduction in energy overall and halving the portion size of discretionary food consumed resulted in a 16.9% reduction in energy. Making adjustments to portion size of this magnitude, across all discretionary categories, results in a larger reduction in energy and risk nutrients (sugar, saturated fat, trans fat, sodium and alcohol) than abstaining from eating individual categories of discretionary foods (eg not consuming any cakes and biscuits).

To ensure portion guidance and serving size goals provide meaningful change, this guide must be accompanied by clear timeframes for implementation and monitoring of changes to the food supply. Monitoring and evaluation should be developed at the same time as the guide, in line with best practice project planning.

Portion guidance and serving size goals are a complementary measure and should not be standalone. Dietitians Australia calls on the government to commit to evidence-based initiatives to address unhealthy eating patterns in Australia. These include:

- Comprehensive regulation to protect children under 18 years from exposure to unhealthy food marketing
- Mandatory front of pack labelling scheme that promotes healthy food options
- Strengthening the Nutrition Content and Health Claims Standard
- A health levy on sugar-sweetened beverages
- Restricted promotion (including discounting and multi-buy offers) of unhealthy food and drinks, and increased promotion of healthy food options

Section 1 – Cakes, Muffins, Slices (retail)

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

It is unclear why puddings (eg sticky date pudding, fruit cake) are not included in the cake subcategory. These are flour-based sweet baked foods that have similar nutrient composition to and are consumed like cakes.

Packet mixes should also be included. Cakes, muffins and slices made from packet mix are still discretionary foods and are consumed in the home similarly to pre-prepared cakes, muffins and slices purchased in a retail setting. Packet mixes should clearly state the serving size on packaging.

Directions should include a clear and practical guide as to what the serving size looks like. For example, $\frac{1}{4}$ cup in a patty pan or a circular cake cut into 8 equal slices.

Otherwise, we agree with this definition of cakes, muffins, slices (retail). It is important that the category includes all flavours of cakes, muffins and slices as outlined in Tables 2, 3 and 4. This is how consumers understand and eat cakes, muffins and slices so the detailed definitions should be retained in the final version.

We have concerns with the recommended serving sizes for this category, outlined in response to question 4.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

It is not clear in the rationale why the serving sizes for cakes and muffins must be the same at 90g. This serving size is greater than the current 66th percentile size of 50-68g for cakes. Increasing this serving size for the sake of consistent sizing with muffins, which are typically larger, is not aligned with the intention of the guide to support public health. Cakes, muffins and slices in the out of home sector have 3 separate serving size targets in the out of home sector and the same should be done for the retail sector. A target of 90g for muffins is reasonable, as this is a reduction of ~10%, and would bring the energy content down to ~1200kJ, or two discretionary serves. A 40g target for cakes would be reasonable, as this is 10% smaller than the current 66th percentile, and would bring energy content down to ~600kJ, or one discretionary serve.

The target of 45g for slices is also greater than the current 66th percentile sizing (35g, 623kJ). Increasing this size to 45g is contradictory to the intent of the guide. The guide should recommend 35g serving sizes, consistent with current industry practice.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 2 – Cakes, Muffins, Slices (out of home)

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

It is unclear why puddings (eg sticky date pudding, fruit cake) are not included in the cake sub-category. These are flour-based sweet baked foods that have similar nutrient composition to and are consumed like cakes.

Otherwise, we agree with this definition of cakes, muffins, slices (retail). It is important that the category includes all flavours of cakes, muffins and slices as outlined in Tables 2, 3 and 4. This is how consumers understand and eat cakes, muffins and slices so the detailed definitions should be retained in the final version.

We have concerns with the recommended serving sizes for this category, outlined in response to question 4.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

These recommended serving sizes are still very large, even acknowledging the policy of gradual reductions in recommended servings sizes by 10% to improve consumer acceptance. It would be better to have a planned timeline for further reductions. For example, reduce by 10% each 2 years to match targets to the smaller sizes for cakes, muffins and slices in the retail sector (note our comments on target in section 1, question 4). Based on the Australian Guide to Healthy Eating and the proposed serving sizes, all consumer groups except men 19-50 years would exceed the recommended numbers of discretionary serves with just one cake, and all consumers would exceed recommended intake with one muffin.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 3 – Chocolate and chocolate-based confectionery (retail)

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

The definition specifies white, milk and dark chocolate, and should include ruby chocolate. Otherwise, we agree with the definition of chocolate and chocolate-based confectionery. It is important the level of detail in Table 8 is retained in the final version.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The recommended serving sizes for single-serve items seems appropriate, acknowledging this does not apply to share packs. The current industry guidance re 25g/serve seems appropriate for share packs. Share packs should also make clear that they are meant to be shared, especially where they are not individually wrapped (eg Maltesers, Pods).

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 4 – Crumbed and battered proteins (out of home)

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

We agree with the definition of crumbed and battered proteins. This level of detail in Table 9 should be retained in the final definition. We also note that both this category and the frozen desserts category have been labelled as 'Table 9', so there are two 'Table 9's in the document.

It is unclear why the guide includes target for crumbed and battered proteins in the out of home sector only. Crumbed and battered proteins are purchased in the retail setting, typically frozen, and cooked at home. The products are similar irrespective of where they are prepared/cooked. Other categories (eg savoury pastry products) have targets that apply to both out of home and retail sectors. This would be appropriate for crumbed and battered proteins and only a minor change to the guide.

We have concerns with the recommended serving sizes for this category, outlined in response to question 4.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The target of 150g is larger than the 66th percentile for all three subcategories. This is not aligned with the intent of the guide to support industry to reduce portion sizes to benefit public health.

A more appropriate target would be 120g. This is a rounded number that would require negligible change for most crumbed fish and plant-based protein products, keeping to ~1.5 discretionary serves. A 120g target for crumbed chicken would be a ~10% reduction, bringing the products to ~1200kJ or 2 discretionary serves.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 5 – Frozen desserts, ice-cream and ice-confection (retail)

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

We agree with the definition of frozen desserts, ice-cream and ice-confection. This level of detail in Table 9 should be retained in the final definition. We also note that both this category and the crumbed/battered proteins category have been labelled as 'Table 9', so there are two 'Table 9's in the document.

We have concerns with the recommended serving sizes for this category, outlined in response to question 4.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The guide recommends an 80g serve size for this category, a target higher than the current 66th percentile size is 74g with an energy content of 966kJ. This is not aligned with the intent of the guide to support industry to reduce portion sizes to benefit public health.

It would be more appropriate to set a maximum serving size based on energy content, rather than weight. A market scan conducted by Dietitians Australia on 23 July 2021 showed great variability in kJ/g of ice-cream products. Different ice-creams have different fat and sugar content, influencing palatability and energy content of the product. Due to this variability, a smaller recommended serve size is appropriate to reduce energy intake from high kJ/g ice-creams. A maximum recommended serve size of 65g would be a ~10% size reduction and bring the energy content to ~840kJ, still ~1.5 discretionary serves but closer to the 600kJ ADG serve.

Further, Appendix A (p2) seems to have an error, indicating that a 6g serve size increase results in a ~320kJ decrease. We strongly recommend the working group check their calculations throughout the document for similar errors.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 6 – Sweetened beverages (out of home)

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

The definition should clarify whether beverages sweetened with whole fruit and with no added sugar or fruit juice are included (eg milk-based fruit smoothie). This is implied by the inclusions/exclusions table but is not clear in the definition itself.

The inclusion of brand names '(e.g. the Boost Juice 'All Berry Bang Smoothie')'(p11) does not add value to the explanation. All reference to brand names in Table 10 should be removed.

The table of inclusions and exclusions should specify that frappes, iced tea and bubble tea should be included only if sweetened.

The working group should consider including hot sweetened beverages in this category. Hot beverages consumed out of home like sweetened hot chocolate, matcha latte, chai lattes, seasonal spiced lattes (eg pumpkin spice latte), tea and coffee are consumed similarly to and have similar nutritional value to chilled sweetened beverages.

Further, the working group should consider separating milk-based and water-based sweetened beverages into separate categories, as is done in the Healthy Food Partnership reformulation scheme and the Health Star Rating. Sweetened beverages with substantive additions (eg milk-based fruit smoothies) have a significantly different nutrient profile than water-based sweetened beverages (eg cola soft drink) and should have different targets if portion size targets are to have a meaningful effect.

2. Does the name of the category reflect the definition?

The name should be amended to 'chilled sweetened beverages' to better reflect the exclusions in Table 10. Otherwise, the exclusions should be amended so that category includes hot sweetened beverages, which in the case of hot chocolate, sweetened matcha lattes, chai lattes, seasonal spiced lattes (eg pumpkin spice latte) tea and coffee, are consumed similarly to and have similar nutritional value to chilled sweetened beverages.

3. 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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

As identified in Appendix A (p5), serving sizes for sweetened beverages out of home are significantly larger than serving sizes in retail. The 450mL target seems reasonable to encourage portion size reduction within consumer acceptability. However, Dietitians Australia recommends the best

practice guide sets out a plan for further portion size reduction to reach a recommended size of no greater than 375mL within the next 6 years.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 7 – Pizza (out of home)

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

We agree with the definition of pizza. This level of detail in Table 11 should be retained in the final definition.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The recommended serving size of 200g appears reasonable considering pizza is typically consumed as a meal.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 8 – Potato Products (out of home)

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

Other potato-based snacks such as pommes, puffs, balls, noisettes and gems should be included in the definition as they have similar nutritional value to and are consumed similarly to potato chips and wedges. Innovations such as chips, pommes, puffs, balls, noisettes or gems made from parsnips, turnips and other starchy vegetables should also be included in the definition as these vegetables have a similar nutrition profile to potatoes, and would be consumed similarly.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The recommended servings sizes in the guide seem appropriate. They all result in a serving size and energy content decrease.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 9 – Savoury pastry products, pies, rolls and envelopes (out of home and retail)

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

We agree with the definition of this category, but question whether ‘envelope’ resonates with industry. This does not seem to be standard or common terminology. We recommend the working group consider ‘filled pastry’, ‘pasty’ or ‘parcel’.

We suggest Table 13 is amended to add culturally diverse foods (eg gozleme, samosas) under inclusions.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

The recommended serving size for this category is the same as the 66th percentile - 200g. The purpose of this guide is to encourage and support industry to reduce portion sizes to benefit public health. Setting the recommended size at the current 66th percentile size is at odds with this purpose. A recommended serving size of 180g would be more appropriate, as this would be a 10% reduction consistent with consumer acceptability, and would reduce energy content.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 10 – Sweet Biscuits (retail)

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

The definition of sweet biscuits in a retail setting should include packet mixes and cookie doughs. Sweet biscuits made from packet mix or cookie dough are still a discretionary food and are consumed similarly in the home to pre-prepared sweet biscuits purchased in the retail setting.

Sweet biscuit packet mixes and cookie doughs should clearly state on packaging that a serving size is no more than 30g of product as prepared according to directions. Directions should include a clear and practical guide as to what the serving size looks like. For example, a tablespoon rolled into a ball, or two 1cm slices of a dough roll.

It is important that the category includes all flavours of sweet biscuit, coated, uncoated, filled and unfilled varieties as this is how consumers understand and eat sweet biscuits. This should be retained in the final version of the definition.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

No comment.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Section 11 – Sweet Biscuits (out of home)

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

We agree with this definition of sweet biscuits (out of home). It is important that the category includes all flavours of sweet biscuit, coated, uncoated, filled and unfilled varieties as this is how consumers understand and eat sweet biscuits. This should be retained in the final version of the definition.

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?

Dietitians Australia continuously advocates for a healthier food system that gives consumers a great range of nutritious food options. Accredited Practising Dietitians have an important role in supporting companies to modify portion sizes to support public health, while maintaining consumer acceptability.

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

As identified on page 6 of the rationale for consultation, normalising smaller portion sizes can reduce overall energy consumption from discretionary foods and result in significant population health benefits. This population health benefit should provide sufficient motivation for any innovation required to reduce portion sizes.

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

While we do not agree that 60g is 'best practice' for serving size, we acknowledge the different consumption habits in different settings. We recommend serving sizes for sweet biscuits in the out of home sector gradually decrease to overcome the new norm of having a giant sweet biscuit when eating out.

We note that Appendix A (p3) of the rationale document identifies the 66th percentile size for sweet biscuits in the out of home sector as 64g, 2.6 times greater than the 66th percentile size for sweet biscuits in the retail sector. This proportional difference is not reflected in the next three columns which indicate a 60g sweet biscuit would contain only 1.5 times the energy of a sweet biscuit half its size. We strongly encourage the working group to check calculations.

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

The Australian Dietary Guidelines identify one serve of a discretionary food to be approximately 600kJ. Food manufacturers should consider serving sizes indicated in the Australia Dietary Guidelines when selecting portion sizes, and clearly identify how many discretionary serves a product contains (see our response to Part B question 1b). The food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

Part B – Best Practice Guide

1a. What do you like about the two samples, with regards to the look, feel and layout?

Savoury pastries - the image of the pie on the plate is helpful as a size indicator.

1b. What would you change about the two examples, with regards to the look, feel and layout?

It is unclear whether the suggested serving size recommendations for pastries (a baseball) is a weight comparison, dimension comparison, or both. This should be clarified. Further, baseballs are not commonly used in Australia and many people would not have an accurate concept of how large a baseball is. If size comparisons are to be used for recommendations, a more common and practical comparator should be used, for example a cricket ball.

The information about how many discretionary serves a portion provides needs context. The average person is not familiar with the limit of how many discretionary serves per day they could have. While we appreciate the maximum number of discretionary serves depends on an individual's energy requirements and differs across the age-gender groups, a common maximum of 2 serves could be used. A statement or visual (eg dial) should show the number of discretionary serves compared with the recommended maximum.

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

	Helpful	Neutral	Not helpful
Category definition	X		
Serving size recommendation	X		
Tips & tricks – category specific	X		
Guiding principles for resizing	X		
How to review the serving size information on labels of products	X		
How to indicate a smaller serving size on pack	X		
Case studies	X		
Rationale for serving size recommendation	X		

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

Dietitians Australia members across work settings may access the guide online or by printing and using a hardcopy.

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

The guide should be promoted via:

- Healthy Food Partnership website
- Public Health/NGO peak bodies
- Industry peak bodies
- Forums
- Bodies representing cafes, restaurants and convenience stores

Part C – General Comments

While the intention of the guide is to support portion size reduction and therefore benefit public health, we do not agree that this document outlines true best practice. Best practice would be to reduce all portion sizes to size where they provide 600kJ of energy, equal to one discretionary serve according to the Australian Dietary Guidelines. The guide should be retitled to reflect this, removing 'best practice'. For example, 'Guide to voluntary serving size reduction'.

Portion guidance and serving size goals are a complementary measure and should not be standalone. Dietitians Australia calls on the government to commit to evidence-based initiatives to address unhealthy eating patterns in Australia. These include:

- Comprehensive regulation to protect children under 18 years from exposure to unhealthy food marketing
- Mandatory front of pack labelling scheme that promotes healthy food options
- Strengthening the Nutrition Content and Health Claims Standard
- A health levy on sugar-sweetened beverages

Restricted promotion (including discounting and multi-buy offers) of unhealthy food and drinks, and increased promotion of healthy food options.

References

1. James-Martin G, Baird DL, Hendrie GA. Strategies to Reduce Consumption of Unhealthy Foods and Beverages: Scenario Modeling to Estimate the Impact on the Australian Population's Energy and Nutrient Intakes. *Journal of the Academy of Nutrition and Dietetics*. 2021;121(8):1463-83. 10.1016/j.jand.2020.12.003