

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

**Response to consultation  
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## **Recipient**

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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.

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 Regulation and Policy Advocacy Working Group 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.

## Feedback

### Cakes, Muffins, Slices

#### Extra sub-categories

Dietitians Australia recognises that heavy cakes such as mud cake and cheesecake are typically denser than light-medium cakes such as sponge cake and butter cake and therefore have a heavier weight per volume. Separate definitions and serving size targets appear appropriate on this basis. 'Cakes – heavy weight' is a meaningful descriptor for the types of cakes included in the sub-category.

#### Sub-category inclusions

We are pleased to see the inclusion of packet mixes included in the definitions for heavy and light-medium weight cakes, as recommended in our previous submission. 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.

We recommend brownies be included in the heavy weight cakes sub-category as they are nutritionally similar to mud cakes (typically include 1:1:2:2 butter:chocolate:sugar:flour/cocoa ratio) and are consumed similarly in the out of home setting (eg large serving sizes).

We acknowledge that puddings are categorised as desserts under the National Nutrition and Physical Activity Survey 2011-12, but maintain the recommendation that sticky date pudding be included in the light-medium cake category. The word 'pudding' in the name is due to the British use of the word, interchangeable with 'dessert'. Sticky date pudding is not nutritionally similar to nor consumed like milk-based puddings (eg crème brûlée, baked custard). Sticky date pudding is a self-saucing cake, nutritionally similar to and consumed like a dense sponge cake served with a sweet sauce. It is also typically displayed next to cakes in the out of home setting and the freezer aisle in the retail setting. It may confuse consumers to have smaller sized cakes available next to larger sized sticky date puddings due to the British use of the word 'pudding' to mean any type of dessert. Sticky date pudding should be included in the light-medium weight cake category.

#### Serving size targets

We maintain concerns with the serving size targets for the out of home sector being labelled 'best practice' when most consumer groups would exceed the recommended daily number of discretionary serves with just 1 serving of cake or 1 muffin. We recommend a planned timeline for

further reductions. For example, reduce serving sizes by 10% each 2 years to match targets to the smaller serving sizes for cakes, muffins and slices in the retail sector.

## **Chilled beverages**

### **Category name**

We support revising the category name to include 'chilled' as we recommended in our previous submission.

### **Definition and inclusions**

We support the revision of the category definition to be better aligned with the Food Standards Code.

We support the inclusion of fruit and vegetable juices in this category as chilled calorific beverages.

We maintain that milk-based and water-based chilled sweet beverages should be separated into sub-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 soft drink) and should have different targets if serving size targets are to have a meaningful effect. The Implementation Best Practice Working Group should plan to split water-based and milk-based chilled beverages into separate sub-categories within the next 2 years before conducting a full review of the targets in 5 years.

We are pleased to see removal of brand names in the inclusions table as recommended in our previous submission.

We support the inclusion of non-nutritively sweetened beverages in this category. Having the same targets for non-nutritively or sugar-sweetened chilled beverages will be simpler for consumers and sellers, rather than having multiple serve size targets for what is functionally the same beverage.

### **Serving size targets**

We support the conversions for retail beverages paired with meals. While 450mL is a large portion for beverage that is not water, it is a step in the right direction. 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 (typically ~600kJ for soft drinks, equal to 1 discretionary serve according to the Australian Dietary Guidelines) within the next 6 years.

We support the decision to apply the serving size targets to beverages with or without ice. Consumers typically have the option to request no ice or a partial amount of ice in a chilled beverage served in a standard size cup, hence the full volume of the cup should be considered the serving size.

### **Hot sweetened beverages**

We strongly recommend guidance for hot beverages be developed. Hot sweetened beverages such as hot chocolate, matcha lattes, chai lattes, seasonal spiced beverages (eg pumpkin spice latte), sweetened tea and sweetened coffee are nutritionally similar to and consumed like chilled sweetened beverages. They contribute significantly to caloric intake and should be included in serving size reform efforts.

## 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. Serving sizes are still very large for many categories and will encourage excessive intake of total energy, saturated fat, sodium and added sugar, and distorted perceptions of normal food intake. The guide should be retitled to reflect this, removing 'best practice' – for example, 'Guide to voluntary serving size reduction'. This alternative title acknowledges that the serving size targets are a step in the right direction, with more steps to be taken before the targets can be considered best practice.

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.