

# Healthy Food Partnership Industry Guide to Voluntary Serving Size Reduction:

## Public Consultation Summary of Submissions

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## Glossary

Discretionary foods and beverages	This includes foods and beverages not necessary to provide the nutrients the body needs, but that may add variety to the diet. Many of these are high in saturated fats, added sugars, salt and/or alcohol and are therefore described as energy dense.
Out of home	<p>Outlets where food and/or beverage is prepared for immediate consumption, for example cafés (including those within a retail, petrol and convenience store), restaurants, pubs, clubs, quick service restaurants (QSRs), canteens, online businesses that sell food or beverage for takeaway or home delivery and retail ‘on the go’ products.</p> <p>Retail ‘on the go’ products include, but are not limited to, beverages (all varieties including smoothies, juices and soft drinks served in cups or glasses, but not prepacked, bottled, or canned cold drinks), bakery items (predominantly loose pastries, cakes, biscuits, slices) and ready to eat options such as pizza, chicken nuggets and hot chips.</p>
Portion size	The size or amount of food and/or beverage selected by an individual from what is on offer.
Retail	Food products sold in retail environments, for example supermarkets, petrol stations and convenience stores.
Serve size	A reference amount of a food and/or beverage described by the Australian Dietary Guidelines and its companion document, the Eat for Health Educator Guide. A serve of discretionary food, as defined in the Eat for Health Educator Guide, is the amount that contains 600 kJ <sup>1</sup> .
Serving size	The size or amount of a product (food and/or beverage), suggested by others, such as on-pack labelling by a manufacturer or provided by a food service business.
The Guide	Industry Guide to Voluntary Serving Size Reduction (known as the Industry Best Practice Guide during public consultation).

1. National Health and Medical Research Council (NHMRC). Eat for Health Educator Guide. Canberra: NHMRC. 2013.

## Abbreviations

AACS	Australasian Association of Convenience Stores
ABCL	Australian Beverages Council Limited
ADG	Australian Dietary Guidelines
AFGC	Australian Food and Grocery Council
Ai Group	Australian Industry Group (Confectionery Sector)
FBIA	Food and Beverage Importers Association
GLOBE	Global Obesity Centre, Deakin University
IBPGWG	Industry Best Practice Guide Working Group
NZFGC	New Zealand Food and Grocery Council
OOH	Out of home sector
PHAA	Public Health Association of Australia
QSR	Quick service restaurants

# Healthy Food Partnership Industry Best Practice Guide for Serving Sizes - Public Consultation: Summary of Submissions

## Introduction

The Healthy Food Partnership Serving Size Recommendations with example pages of the Industry Best Practice Guide (the Guide) were developed by the Industry Best Practice Guide Working Group across 2019-21. Detailed information about this process is included in the *Healthy Food Partnership: Industry Best Practice Guide for Serving Size: Evidence Informing the Approach and Recommended Serving Sizes* (the Rationale).

This report provides a summary and analysis of the public consultation which was open for 6 weeks, from 24 July 2021 through to 4 August 2021 and additional targeted consultation conducted on the Sweetened Beverages and Cakes categories in November 2021 (outlined at Appendix B). 27 submissions were received in response to the public consultation paper from a range of stakeholders representing food industry (52%), public health organisations or academia (33%), government (11%) and one consumer (4%). There was a varied number of responses to each question. The majority of respondents had a nutrition background. The background/role of other respondents included food regulation, marketing, and government relations. Of the 27 submitters, 13 represented a national organisation, others were based in NSW (n=5), Victoria (n=4), WA (n=2), QLD (n=1), New Zealand (n=2).

The report is organised into 3 sections: Part A summarises the feedback on the food categories: definitions, inclusion and exclusion of items, concerns, technical constraints and challenges for serving size reductions. Part B summarises feedback on the two example pages of the Guide, including the look and feel of the layout, and the perceived usefulness of the included information. Part C summarises general comments and recommendations from respondents related to portion and serving size.

Submissions which provided consent to be published in an identifiable format have at times been specifically identified. Respondents who consented to the publication of their submissions are listed at Appendix C.

## Part A – Serving Size Recommendations

### Support for serving size recommendations as a public health measure

Twenty-five out of 27 respondents answered this question. Twenty-three respondents indicated that they support portion guidance and serving size goals as a complementary public health measure. Two respondents (one industry group - Australasian Association of Convenience Stores (AACS) and one member of the public) do not support portion guidance and serving size goals as a complementary public health measure.

The one consumer that responded to the consultation states that portion size and serving size goals as a complementary health measure are unnecessary and that current serving sizes are too small.

The AACS states that the recommendations may be relevant for specific food items, but that multiple options (for both serving sizes and no sugar/low sugar) already exist within the Petrol & Convenience channel and additional guidance is not needed.

KFC support the intent of the Industry Best Practice Guide; however, they do not support the implementation of the guidance for KFC products citing the construction of their menu, consumer expectations, and supply chain constraints as barriers. Additional context is provided in *Food Category 4: Crumbed and battered proteins: Out of home* and *Food Category 8: Potato Products*.

The reasons given for supporting portion size guidance and serving size goals included acknowledgement of the effect of large serving sizes on overweight and obesity and that setting recommended serving sizes is an opportunity to encourage the out of home and retail settings to reduce the available serving sizes of discretionary foods.

Many respondents from public health were not supportive of the voluntary nature of the guidance. It was proposed there should be provisions to mandate the initiative unless there are significant uptake levels within a short timeframe (i.e. 12 months). Cancer Council Australia, supported by NSW Cancer Council, Global Obesity Centre (GLOBE), Deakin University, the Heart Foundation, The George Institute and PHAA advocates for a serving size equivalent to 600 kJ (as outlined in the Eat for Health Educator Guide, a companion document to the Australian Dietary Guidelines) across all categories.

Respondents from both public health and industry noted the importance of complementary consumer education to raise awareness of appropriate serving and portion sizes among the general population and influence behavioural change.

Woolworths, Food and Beverage Importers Association (FBIA) and WA Department of Health (WA Health) noted the serving size recommendations are targeted at adults, and recommended consideration of additional guidance for products marketed at children. This was considered out-of-scope for the IBPGWG, however, a separate Healthy Food Partnership project on Foods for Early Childhood will consider recommendation.

### Food Categories: Summary of consultation and working groups consideration

Respondents were asked to comment on the serving size recommendations for the 11 food categories identified by the IBPGWG. The following table shows the recommended maximum serving size for each food category at the time of consultation (Table 1).

**Table 1: Recommended maximum serving sizes**

Category	Setting	Draft Category Serving Size Recommendation	Revised Category Serving Size Recommendation
Cakes, muffins and slices	Retail	90 g for cakes and muffins; 45 g for slices	No change
	Out of home	125 g cakes; 150 g muffins; 90 g slices	Up to 150 g for heavy weight cakes; 125 g for light-medium weight cakes; 150 g for muffins; 90 g for slices
Chocolate and chocolate-based confectionery Renamed 'Chocolate and chocolate-alternative-based	Retail	50 g (unportioned chocolate bars)	Up to 50 g for single consumption bars; 25 g +/- 5 g for all other products

Category	Setting	Draft Category Serving Size Recommendation	Revised Category Serving Size Recommendation
confectionary' post-consultation			
Sweet biscuits	Retail	30 g	Unchanged
	Out of home	60 g	Unchanged
Frozen desserts and ice-cream Renamed 'Ice-cream, ice-cream confections and frozen desserts' post-consultation	Retail	80 g	Up to 75 g for sticks/single servings; 50 g for tubs
Sweetened beverages Renamed 'Chilled beverages' post-consultation	Out of home	450 ml	Unchanged
Crumbed and battered proteins	Out of home	150 g	Unchanged
Pizza	Out of home	200 g	Unchanged
Potato products (i.e. chips/fries) Renamed 'Hot potato chips, fries and wedges' post-consultation	Out of home	150 g	Unchanged
Savoury pastry products, pies, rolls and envelopes Renamed 'Savoury pastry products' post-consultation	Out of home and Retail	200 g	Unchanged

For each of the 11 food categories, respondents were asked for feedback on five main questions:

- Do you agree with the definition of this category? Is there anything that needs to be added/deleted?
- 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?
- Are you aware of any technical constraints to reducing the serving size?
- Are there other concerns or challenges with reducing the serving size of this category?
- Are there other portion guidance and serving size initiatives in Australia you are aware of that impact this category?
- In addition to the 5 questions, many respondents commented on the recommended serving sizes.

The responses to these questions have been summarised by individual category.

## 1. Cakes, Muffins, Slices: Retail

### 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:

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

This definition was revised post-consultation to: Freshly baked, frozen or shelf-stable cakes, muffins and slices sold in retail. Includes packet baking mixes. Includes three sub-categories:

- A. Cakes  
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. Includes packet baking mixes.
- 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 retail in pre-portioned servings. Includes packet baking mixes.
- C. Slices  
Freshly baked, frozen or shelf-stable slices sold in retail. Includes 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.

**Table 2: Consultation recommendations and IBPGWG decisions – Cakes, Muffins and Slices: Retail**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>  10/27 respondents answered  - 3 support definition  - 7 did not support	Include baking mixes for each sub-category  Rationale: These products have a similar nutritional content to ready-to-eat products.	Agreed. Current serving sizes of baking mixes are comparable to the baked form. This also aligns with the approach taken for the Sweet biscuits: Retail category. Definition and category inclusions lists have been amended.
	Include puddings (e.g. sticky date pudding, fruit cake) in the cake category  Rationale: These are flour-based sweet baked foods that have similar nutrient	Puddings were not considered in the analysis as they are categorised as desserts under the National Nutrition and Physical Activity Survey 2011-12 from which the priority food categories were determined.



Type of recommendation	Specific recommendation	IBPGWG decision
	composition to and are consumed like cakes.	Fruit cake is already included in the definition.
	<p>Exclude vanilla slices</p> <p>Rationale: Technical advice: 135 g (one company's current serving size for Vanilla Slice) is the smallest dimension for a fresh product which ensures it is stable and does not fall apart. It was suggested a smaller vanilla slice would be possible in the frozen space only.</p>	Remain included as research indicates vanilla slices can be made smaller. Consider incorporation of additional guidance into the Guide.
	<p>Align with Partnership Reformulation Program definition</p> <p>Rationale: Different category definitions will result in increased administration to manage two different sets of criteria.</p>	Do not align. The definitions serve different purposes.
<b>Clarify definition</b>	Clarify inclusion of confectionery type (e.g. rocky road slices) or fruit and nut type slices.	Category inclusions list has been amended.
	Clarify if cupcakes without a frosting or a coating are included	Category inclusions list has been amended to include cupcakes without frosting/coating in the cakes.
	Clarify if savoury slices are intended to be included	Category exclusions list has been amended to clarify exclusion of savoury slices.
<b>Amend serving size</b>	<p>Separate serving sizes for cakes and muffins</p> <p>Rationale: These products may have differences in nutritional profile (e.g. muffins are not typically iced and often contain vegetables or fruit).</p>	The data does not support separate serving sizes in the retail sector for cakes and muffins.
	<p>Align serving sizes for out of home and retail</p> <p>Rationale: Align to provide consistent messaging to consumers.</p>	It is not practical to align the serving sizes for out of home and retail due to significant differences in the current serving sizes between the two sectors. IBPGWG agreed a nudge approach is more realistic.

Type of recommendation	Specific recommendation	IBPGWG decision
	Align with Eat for Health discretionary serve size of 600 kJ	It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.
<b>Technical considerations</b>	Cakes may crumble if cut too small, including pre-cut products in multipacks.	Noted. Consider incorporation of additional guidance into the Guide.
	Pre-cut products have a shorter shelf life which needs to be considered.	Noted. Consider incorporation of additional guidance into the Guide.

*Other Serving Size Guidance and Initiatives*

Dietitians Australia cited the Eat for Health discretionary serve of 600 kJ (40 g for a slice of cake) and suggest food manufacturers should clearly identify how many discretionary serves a product contains.

Dietitians Australia note the food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

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

### Definition

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

Contained three sub-categories:

A. Cakes

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

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.

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.

This definition was revised post-consultation to split the cakes sub-category into two sub-categories. The revised definition is:

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

A. Cakes – heavy weight

Freshly baked, frozen or shelf-stable mud cakes and cheesecakes sold in the out of home sector. Includes cake sold whole or pre-portioned (with or without toppings), or cupcakes with or without a frosting or a coating.

B. Cakes – light-medium weight

Freshly baked, frozen or shelf-stable light and medium cakes sold in the out of home sector. Includes cake sold whole or pre-portioned (with or without toppings), or cupcakes with or without a frosting or a coating. Excludes mud cakes and cheesecakes.

C. Muffins

Freshly baked, frozen or shelf-stable muffins, with or without a topping (e.g. crumbs, dusted with icing sugar, chocolate drizzle), sold in the out of home sector, in pre-portioned servings.

D. Slices

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

**Table 3: Consultation recommendations and IBPGWG decisions – Cakes, Muffins and Slices: Out of Home**

Type of recommendation	Specific recommendation	IBPGWG response
<p><b>Amend definition</b></p> <p>10/27 respondents answered</p> <p>- 4 support definition</p> <p>- 6 did not support</p>	<p>Include puddings (e.g. sticky date pudding, fruit cake) in the cake category.</p> <p>Rationale: These are flour-based sweet baked foods that have similar nutrient composition to and are consumed like cakes.</p>	<p>Puddings were not considered in the analysis as they are categorised as desserts under the National Nutrition and Physical Activity Survey 2011-12 from which the priority food categories were determined.</p> <p>Fruit cake is already included in the definition.</p>
	<p>Exclude vanilla slices</p> <p>Rationale: Technical advice: 135 g (one company’s current serving size for Vanilla Slice) is the smallest dimension for a fresh product which ensures it is stable and does not fall apart. It was suggested a smaller vanilla slice would be possible in the frozen space only.</p>	<p>Remain included as research indicates vanilla slices can be made smaller. Consider incorporation of additional guidance into the Guide.</p>
<p><b>Amend serving size</b></p>	<p>Align the serving sizes for the retail and out of home sectors</p> <p>Rationale: The differences between the recommended serving size for cakes, muffins and slices in the out of home and retail sectors may create consumer confusion and distrust in serving size information.</p>	<p>It is not practical to align the serving sizes for out of home and retail due to significant differences in serving sizes as indicated by research data between the two sectors. IBPGWG agreed a nudge approach is more realistic.</p>
	<p>Align with Eat for Health discretionary serve size of 600 kJ.</p> <p>Rationale: Public Health groups concerned the maximum serving sizes are too large and should be aligned with the Eat for Health discretionary serve size.</p>	<p>It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.</p>
	<p>Plan further reductions, for example a reduction of 10% every 2 years.</p> <p>Rationale: Dietitians Australia recommend the serving sizes are aligned with the Eat for Health discretionary serve size, while acknowledging that large reductions are unlikely to be accepted by consumers.</p>	<p>The IBPGWG recommends the serving sizes in the Guide are regularly reviewed.</p>

Type of recommendation	Specific recommendation	IBPGWG response
<b>Other considerations</b>	<p>Availability of smaller serving sizes from suppliers/distributors, and consumer expectations.</p> <p>Rationale: Providing a range of options as opposed to limiting choice or making small changes over time may be more successful in this space.</p>	Noted.

Other concerns/comments

One respondent noted that any guidance or learnings on serving size for vanilla slice that can be shared for food manufacturers would be helpful.

Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

- Woolworths noted they generally purchase single servings of cakes, muffins and slices for their cafes and displays kilojoule labelling on their menu boards/shelf tickets to help customers make informed and healthier choices.
- All QSRs provide menu board labelling and full nutrition information on-line to help consumers make informed purchasing decisions at the point of sale.

Other related initiatives

- WA Health noted that a discretionary serve of cake, slices and muffins according to the Eat for Health Educator’s Guide is 40 g or 600 kJ. The mandatory Healthy Options WA Food and Nutrition Policy uses serving sizes and nutrient criteria to classify food and drinks sold in all WA health entity premises using a traffic light approach: red, amber or green. Under the Policy, sweet muffins are classified as Amber if: the serve size is 60 g or less, they contain fruit and/or other vegetables and do not contain confectionery. Sweet muffins are classified as Red if the serving size is greater than 60 g or if they contain confectionery.

### 3. Chocolate and chocolate-based confectionery: Retail

*This category was renamed ‘Chocolate and chocolate-alternative-based confectionery’ post-consultation.*

#### Definition

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

This definition was revised following public consultation to: “Plain chocolate, chocolate-based and chocolate-alternative-based confectionery, including all varieties (white, milk or dark chocolate) sold in the retail setting”. (Note that cooking chocolate remains excluded from the category, as detailed in the Category Definitions: Inclusions and Exclusions).

**Table 4: Consultation recommendations and IBPGWG decisions – Chocolate and chocolate-alternative based confectionery**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>  13/27 respondents answered  - 7 support definition - 6 did not support	Include ‘compounded chocolate’  Rationale: Compounded chocolate technically is not chocolate, as defined by the Australia/New Food Standards Code (FSC), however, it is chocolate style confectionery and may be used as a substitute for chocolate.	Definition has been amended to include compounded chocolate.
	Amend definition to include all chocolate varieties or omit the text specifying the chocolate types.	IBPGWG agreed to amend category name to ‘Chocolate and chocolate-alternative-based’ to better reflect the category inclusions. Definition has been amended to include all chocolate-types and specifically exclude cooking chocolate.
	Exclude seasonal products i.e. Christmas Chocolates and Easter Bunny figurines.	Category exclusions list has been amended to exclude seasonal products.
<b>Amend serving size</b>	Align with Eat for Health discretionary serve size of 600 kJ.	It is not practical or appropriate to align the maximum recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great. However, the recommendation for multi-serve products does align with 600 kJ.

Type of recommendation	Specific recommendation	IBPGWG decision
	Align with existing industry guidance (25 g +/- 5 g).	<p>The existing industry guidance of 25 g +/- 5 g is designed as a serving size for multi-serve, portioned or partitioned products. The Guide has been updated to incorporate this recommendation in addition to the 50 g recommended maximum.</p> <p>The 50 g maximum serving size recommendation is intended to apply to single serve chocolate bars.</p> <p>Consultation with industry offers confidence that the industry will evolve its existing serving size guidance to incorporate the maximum serving size of 50 g for single serve chocolate bars.</p>

Serving size

Dietitians Australia and 2 chocolate bar manufacturers agreed with the maximum recommended serving size for single consumption bars. Dietitians Australia acknowledged that the recommendation does not apply to share packs, and the current industry guidance (25 g +/- 5 g) seems appropriate for those products.

The Ai Group made the following recommendations with regards to serving size:

1. The existing confectionery industry serving size guidance appropriateness be recognised by the Healthy Food Partnership.
2. If Recommendation [1] is not accepted, the confectionery industry would consider reviewing and evolving [their] guidance, with the support of the Healthy Food Partnership. This way, there would be a single source of serving guidance (category specific) for the confectionery industry.

The IBPGWG agreed to recognise the existing industry guidance in the Guide, noting that the industry’s *Be treatwise* guidance provides a detailed reference for the confectionery industry.

WA Health does not agree with the recommended maximum serving size of 50 g for single serve chocolate bars as the serving size is equivalent to 2 Eat for Health discretionary serves. WA Health is concerned manufacturers following the recommendation could increase the serving size of chocolate bars that are currently less than 50 g to a 50 g serving size. WA Health does not think it is appropriate for consumers to consume 2 discretionary serves in one sitting.

Technical considerations

Industry noted that serving size changes have flow-on implications through production and packaging cycles – commencing with unit retooling. This flows into plant reconfiguration, production scheduling and packaging adjustments.

Other concerns

Multiple respondents noted the need for acceptance and implementation from all stakeholders. If the recommended serving size is not adopted by all companies, there is a risk that customers may switch to

other products that are not adopting recommended serving sizes. Broad sharing of the Guide with food industry and retailers will help to overcome these challenges.

Australian companies also compete domestically against imports and parallel imports which may not adhere to the maximum recommended serving size.

The cost required to reduce the serving size of chocolate bars (noting the technical considerations discussed above) was also cited as a significant barrier.



### Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

The Ai Group report that confectionery companies are increasing the proportion of smaller servings as a percentage of their portfolio and introducing new products that are appropriately sized, including internal guidelines for serving sizes based on energy per serving. For some, these commitments mean reducing single consumption bars to fewer than 250 calories (1,046 kJ) with steps in progress to reduce to fewer than 200 calories (837 kJ); for multi-serve bars the target is fewer than 200 calories (837 kJ) per serve; increasing the offering of portion-controlled products with fewer than 200 calories (837 kJ) per serve. For children's and fun size products the target is fewer than 110 calories (460 kJ) and typically 100 calories (418 kJ) per serve, respectively.

Nestlé report reducing the serving size of a number of single serving chocolate bars over recent years and provided a number of examples such as the introduction of re-sealable packing. Nestlé also report reducing the serving size of KIT KAT CHUNKY in 2020 through the use of new technology and smaller moulds at the factory. The target for this project was to reduce the serving size below 50 g for filled KIT KAT CHUNKY bars. The latest products launched in this range are a 45 g serving size.

Mondelēz noted their commitment to the *Be treatwise* recommended serving sizing. They also reported providing practical information for consumers on all products, including suggested serving sizes. Mondelēz also has a range of portion-controlled snack options – snacks that are 837 kJ/200 calories or less and are individually wrapped.

Ai Group noted that the confectionery industry has engaged in consumer education initiatives. The *Be treatwise* logo is on more than 90% of major confectionery manufacturers' branded products and a growing number of small and medium size companies' products. *Be treatwise* is also promoted through off-pack communication, including print, digital, advertorial and point of sale retail merchandise.

Mondelēz has an internal initiative to educate consumers using on-pack information, which they will be rolling out on all packaging by 2025. Mindful Snacking is a behavioural approach guiding consumers to snack with intention and attention. The Mindful Snacking icon consists of a visual representation of what a portion is (for example, 3 biscuits) and the energy content of each portion. Fourteen per cent of packs globally contain the Mindful Snacking icon, with plans under way to invest in digital consumer education campaigns to reach more consumers with practical tips and tools to help them snack mindfully.

### Other Serving Size Guidance and Initiatives

Twenty-five grams of chocolate is listed as an example serve of discretionary food in the Eat for Health Educators Guide.

There is existing industry guidance for chocolate and confectionery products (*Be treatwise*). The Ai Group developed the *Be treatwise* initiative, in consultation with industry. The guidance includes the following serving side recommendation: a single portion/serving of confectionery is the entire 'single' portion in a bar, a pack or amount that supplies approximately 25 g +/- 5 g. The maximum 50 g bar recommendation will build on industry's approach to serving size guidance.

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

### Definition

Meat, poultry, seafood and plant-based proteins which have been coated with a crumb or batter made from flour or flour-alternatives and sold in the out of home sector. Includes products prepared on-site or pre-prepared.

**Table 5: Consultation recommendations and IBPGWG decisions – Crumbed and battered proteins**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>  11/27 respondents answered  - 7 support the definition - 4 did not support	Include other protein style products that might not necessarily be battered/crumbed but are deep fried.	These products will remain excluded as they did not form part of the original scope. The data reviewed was only for crumbed and battered proteins.
	Apply to both out of home and retail sectors.	IBPGWG agreed that the category applies to OOH sector only. This sector includes Retail 'On the Go' products. Reformulation targets for this category currently exist for the Retail Sector under the Partnership Reformulation Program.
<b>Clarify definition</b>	Clarify the inclusion / exclusion of crumbed proteins with vegetables.  Rationale: Under inclusions, the description states 'may have toppings e.g. vegetables', yet under exclusions, the description states 'products with savoury additives 'e.g. schnitzel with vegetables'.	Crumbed proteins with any toppings (e.g. chicken parmigiana, schnitzel with mushroom sauce) are included. Removed reference to ready meals with vegetables from the exclusions list, as not relevant to the out of home category.
<b>Amend serving size</b>	Clarify whether 150 g refers to the cooked or raw weight of products and whether it relates to total weight or edible portion.  Rationale: Eliminates variables when cooking and the edible portion is what consumers eat.	150 g refers to the cooked weight of a product without the bone. The category definition has been amended to reflect this decision. The IBPGWG will consider additional guidance in the Guide on raw weight versus cooked weight e.g. moisture loss.
	Reduce recommended serving size to 120 g.	The recommended maximum serving size will remain as 150 g based on the analysed data. IBPGWG considered the

Type of recommendation	Specific recommendation	IBPGWG decision
	<p>Rationale:</p> <p>Dietitians Australia note that the recommended serving size of 150 g is larger than the 66<sup>th</sup> percentile for all three subcategories and that this is not aligned with the intent of the guide to support industry to reduce portion sizes to benefit public health. Dietitians Australia recommend reducing the serving size to 120 g. A 120 g target for crumbed chicken would be a ~10% reduction, bringing the products to ~1,200 kJ or 2 discretionary serves.</p>	<p>66<sup>th</sup> percentile and the median amount consumed for crumbed and battered fish, meat, pork, lamb and chicken. 150 g is also consistent with other jurisdictional guidance in ACT, QLD, SA and Victoria.</p>
	<p>Align with Eat for Health discretionary serve size of 600 kJ.</p>	<p>It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.</p>
<p><b>Technical considerations</b></p>	<p>Plant based protein products are often moulded. Reducing the serving size of these products would require new moulds which come at considerable expense.</p>	<p>Noted.</p>
	<p>The recommended serving size is feasible for individual pieces of chicken such as wings and drumsticks, and fish fillets however for individual pieces of chicken breast and thigh the recommended serving size may be technically challenging. To consistently obtain chicken breasts and thighs that weigh ≤ 150 g, new sources of chicken meat would need to be sourced, and in some QSRs, new cooking equipment and associated operating procedures would need to be implemented to</p>	<p>Noted.</p>

Type of recommendation	Specific recommendation	IBPGWG decision
	ensure the final product meets food safety requirements.	

Other concerns

Public health respondents noted concerns that the recommended serving size for this category may encourage manufacturers to maintain larger serving sizes of products (as 150 g is larger than the 66<sup>th</sup> percentile).

Industry respondents have noted there may be difficulties in communicating the serving sizes to customers for multi-serve products in the out of home sector which do not display nutrition information on product packaging.

Industry respondents noted that crumbed proteins are generally sold in a set number of pieces at various sizes or as part of meal deals and it is up to consumers to determine their individual portion size regardless of what the retailer/food manufacturer may suggest.

KFC has indicated they do not believe they can reduce the portion size of their products without changing the pricing for the product, which would require substantial work and entail additional costings and expenditure. Consumer research would need to be undertaken to understand the impacts of changing menu item pricing to understand the impact on customers in terms of their expectations and the affordability of menu items. This may further impact supply chain and costings of goods from downstream producers.

KFC support referring to [serving] sizes on their website menu to help their customers make informed choices about their purchases (e.g. individual items, shared bundles and snack menus).

The National Retail Association, representing the QSR sector, have noted that reducing the serving sizes of chicken breast meat and fish fillets will have flow on effects for burgers – bun sizes and the amount of additional ingredients (e.g. mayonnaise, lettuce, tomato and sauces) will all need to be proportionately reduced. These changes would flow through the entire supply chain and will add additional costs that would need to be passed on to consumers. Consumers would ultimately end up with a smaller product at increased cost, representing a reduction in value for money.

An industry organisation noted that the competitive advantage of some out of home outlets may be compromised if a strict 150 g is to be complied with. However, a voluntary guideline is acceptable. A number of industry respondents noted the importance of education, of both servers and the consumers.

Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

Nestlé note they have developed Nutrient Profiling criteria to help guide serve size based upon limits in total energy, saturated fat and sodium relevant to the food category, the target consumer, and the meal occasion at which it consumed. Consumer research is also used by Nestlé to support serve size decisions.

Woolworths has recently standardised crumbed chicken products to 3 or 6 pieces for tenders and wings and 5 or 10 pieces for chicken nuggets. These offers are currently labelled as single serve packs and align with kilojoule labelling which accounts for the situation a consumer eats the whole portion.

All QSRs provide menu board labelling and full nutrition information on-line and via Apps to help consumers make informed purchasing decisions at the point of sale. While small, medium (regular) and large serving sizes are available at most QSRs, regular serving sizes are the default offering.

KFC utilises their website, mobile app and delivery partner channels, to guide consumers on menu items that meet their needs by offering shared meals, individual items, and snack options. "Regular" serving size meal options are the default offering across the KFC menu and "large" size options are not actively promoted.

#### Other Serving Size Guidance and Initiatives

The Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit has portion size guidelines for crumbed and battered protein products. The portion guideline is 140 g.

Healthy food and drink policies in the Australian Capital Territory, Queensland, Victoria and South Australia apply a maximum serve size of 150 g for battered and crumbed protein products, combined with other nutrient criteria (sodium, saturated fat) to classify a product as Amber or Red.

## 5. Frozen desserts and ice-cream: Retail

*This category was renamed 'Ice-cream, ice-cream confections and frozen desserts' post-consultation.*

### Definition

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

Following public consultation this definition was revised to: “Dairy or dairy-alternative-based ice-cream, ice-cream confections and desserts sold in retail settings. Includes shelf-stable products”. The category was also split to include separate serving size recommendations for sticks/single servings and tubs.

**Table 6: Consultation recommendations and IBPGWG decisions – Frozen desserts and ice-cream**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>  12/27 respondents answered - 9 support the definition - 3 did not support	Include frozen cakes, mousse and custards	Frozen cakes (with the exception of ice-cream cakes) are already excluded, as these products did not form part of the consumption data from the National Nutrition and Physical Activity Survey 2011-12 used to determine the priority categories. Frozen mousse and custards are excluded.
	Include lactose free / dairy alternatives/ frozen yoghurt / gelato / sorbet	Lactose-free, dairy alternatives, frozen yoghurt and dairy-based gelato are included. Water-based gelato and sorbet will be excluded. Water-based products did not form part of the consumption data from the National Nutrition and Physical Activity Survey 2011-12 used to determine the priority categories. In addition, FoodTrack data showed energy density of these products is lower.
	Separate serving size recommendation for water-based ice-blocks	As above, water-based products are excluded.
	Separate ice-cream and ice-confections  Rationale: Highly variable nutrition profile between these products.	Ice-cream and ice-confections (dairy or alternative-based with vegetable fat) will not be separated. Dairy based and non-dairy have similar energy density.
<b>Clarify definition</b>	Clarify inclusion of shelf stable ice poles	Shelf stable ice-cream and ice-cream confections, including dairy alternatives, are included. As above, water-based products are not included.

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend serving size</b>	Apply to both retail and out of home sectors	There are difficulties in setting a recommended maximum serving size for the OOH sector due to issues with standardisation. To extend the current recommended serving size to the out of home sector would be out of scope as the data used to inform the serving size recommendation did not include the out of home sector.
	Display nutritional information for entire package	This is out of scope of the IBPGWG. Information on the Nutrition Information Panel is a mandatory requirement under the Australia New Zealand Food Standards Code.
	Reduce serving size to 65 g  Rationale: Dietitians Australia recommend the maximum serving size be reduced to 65 g which is approximately a 10% reduction on the current 66 <sup>th</sup> percentile	IBPGWG considered this suggestion and have formed two sub-categories: sticks/single servings and tubs. The recommended maximum serving size for sticks/single servings is 75 g. The recommended maximum serving size for tubs is 50 g.  IBPGWG acknowledges that where there are larger offerings of a product, there are sometimes smaller offerings of the same product which meet the recommended (maximum) serving size.
	Align with Eat for Health discretionary serve size of 600 kJ	Note that the serving size of 75 g aligns with the Eat for Health discretionary serve in most situations (600 kJ or two scoops of ice-cream).
<b>Technical considerations</b>	Items in this category are general sold by volume, not weight  Rationale: Ice-cream and water ice confection are usually sold on a volume basis, and weight is a less used parameter (i.e. most ice creams have volume listed in mL not g). Therefore, a weight centric target presents challenges for some ice	The recommended measurement unit is to remain as grams for the weight of a product.

Type of recommendation	Specific recommendation	IBPGWG decision
	cream/water-based ice confections.	

### Serving size

Dietitians Australia recommend setting 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 energy per gram 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, Dietitians Australia suggest a smaller recommended serve size is appropriate to reduce energy intake from high energy per gram ice-creams.

An industry representative noted that while the recommended serving size is achievable for most products, a few indulgent products lines will not meet the serving size recommendation due to product architecture (e.g. chocolate coatings and inclusions which are denser than regular ice cream).

It was also noted that to expect all products in a portfolio to be the same serve size is unreasonable, as this impacts on the variety of options available and limits individual choice. A consumer suggested displaying the nutritional information for the entire packet would be useful information.

### Technical considerations

There were a number of technical constraints identified by manufacturers for this category, as summarised below.

- Changing the serve size of existing products would require significant capital investment as machinery used to produce ice cream would need to be changed. As an example, dipping chocolate for coated ice-creams needs to be a certain thickness, or the coating across the ice cream surface becomes unreliable. Chocolate contributes significantly to the product weight, so it would be technically challenging to reduce the coating thickness for chocolate-dipped products without compromising on quality, the expected product experience and mouthfeel.
- Head space within each pack due to downsizing needs to be considered in the context of existing pack formats and machinery. Excessive head space can lead to breaches of Australian Consumer Law due to underfilled packs. When serve sizes are reduced on pre-existing machinery, dosing accuracy is frequently compromised as the machinery was initially built to meet that particular serving size, and unit weights become erratic. When weights become erratic, they no longer consistently match what is printed on pack, and the risk breaching Australia's Trade Measurement Laws<sup>2, 3</sup>. This means the option of downsizing on existing machinery is not always a viable option.

### Other concerns

Other concerns and challenges identified that may impact on reducing the serving size of this category included:

- Consumer expectations. One manufacture noted that previous attempts to reduce serving sizes of these products resulted in complaints from consumers.

<sup>2</sup> Food Standards Australia New Zealand. (2017, January). *Truth in labelling, weights and measures and legibility*. Australian Government. <https://www.foodstandards.gov.au/consumer/labelling/truth/Pages/default.aspx>

<sup>3</sup> Department of Industry, Science and Resources (2022, January). *Buying and selling goods and services by weight and other measurements*. Australian Government. <https://www.industry.gov.au/regulations-and-standards/buying-and-selling-goods-and-services-by-weight-and-other-measurements>



- Potential loss of market share. If the recommended serving sizes are not adopted by all companies, there is a risk that customers may switch to other products that are not adopting recommended serving sizes.
- Lack of influence over imported products. Products are often developed to meet consumer and market needs across numerous countries, and production equipment is created accordingly. Some companies have very limited input over product design and serving size for products developed overseas. This is mainly due to the sales volumes in Australia being much smaller than larger markets. As such, the ability to influence any change to the serving size of those products is limited.

### Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

Unilever's Nutrition Standards are a set of internal nutrient criteria which the company's portfolio is working to meet. These criteria indirectly address serving size.

Woolworths offers mini size products in this category (e.g. Woolworths Mini Ice Cream Almond Sticks 6 Pack which are 46 g per ice-cream). Woolworths is planning to launch more mini variety packs in the future including a 12 pack where each flavour ranges from 34 g to 36 g. Woolworths also includes a description of the serving size in the nutrition information panel (e.g. 1 scoop) to provide context for customers.

### Other Serving Size Guidance and Initiatives

Seventy-five grams of ice-cream is listed as an example serve of discretionary food in the Eat for Health Educator Guide.

Policies for retail frozen desserts, ice cream and ice-confection products, in the Australian Capital Territory, Queensland, Victoria and South Australia, have a maximum energy cut-off of 600 kJ (one discretionary serve) per serving size, in addition to other nutrient criteria (saturated fat) to determine the classification of the product. The Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit portion guideline is 85 ml.

Under the WA Department of Education mandatory Healthy Food and Drink in Public Schools Policy, dairy based ice-creams, frozen yoghurt, and dairy desserts are classified as Amber (foods that should be eaten in moderation) if 600 kJ or less per serving.

## 6. Sweetened beverages: Out of home

*This category was renamed 'Chilled beverages' post-consultation.*

### Definition

Sweetened beverages portioned on site and served cold in the out of home sector. This includes beverages marketed as soft drinks or energy drinks (includes cola and non-cola varieties), fruit drinks (defined in the Australia New Zealand Food Standards Code, Standard 2.6.2 Non-alcoholic beverages and brewed soft drinks), and sweetened dairy-based drinks.

This definition was clarified post-consultation to: "Chilled beverages portioned on site and served cold in the out of home sector. This includes beverages such as soft drinks, fruit drinks or energy drinks (defined in the Australian New Zealand Food Standards Code, Standard 2.6.2 Non-alcoholic beverages and brewed soft drinks and Standard 2.6.4 Formulated caffeinated beverages - energy drinks), fruit juice, and sweetened dairy-based drinks (including plant-based alternatives). Includes non-nutritive sweetened varieties".

**Table 7: Consultation recommendations and IBPGWG decisions – Sweetened Beverages**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Amend definition</b></p> <p>15/27 respondents answered</p> <p>- 6 support the definition</p> <p>- 9 did not support</p>	<p>Include beverages designed for retail that are sold in the out of home sector i.e. sweetened beverages sold in cans and bottles</p>	<p>While pre-packaged beverages in cans and bottles are excluded from the serving size recommendation, guidance on the pairing of these products with meal sizes will be included in the Guide. The IBPGWG recommend that the following guidance be adopted, depending on meal size ordered: 200-250 ml can = small size; 375 ml can/300 ml bottle = medium size; 390 450 ml bottle/440 ml can = large size.</p>
	<p>Include hot sweetened beverages</p> <p>Rationale: Cup sizes for hot beverages have increased in Australia over time and many now serve what used to be a regular cup as a small due to the introduction of larger cups which are now labelled 'regular' size. A large, sweetened latte made with full cream milk, or a value-added sweetened coffee beverage can represent a significant contribution to discretionary energy. Similarly, hot chocolate and value-added variations on these from coffee chains also present significant discretionary energy contributions.</p>	<p>Hot beverages will not be included, as they did not form part of the original scope or data analysis. The IBPGWG will consider the need for separate guidance for these products.</p>
	<p>Include non-dairy sweetened milks (e.g. plant-based flavoured milk beverages)</p>	<p>The IBPGWG propose including all chilled beverages for consistency and ease of implementation. It is impractical from an implementation perspective to set different serving sizes based on kilojoules, sugar or other nutrient content.</p>
	<p>Include fruit and vegetable juices</p> <p>Rationale: Despite being unsweetened, these beverages are high in intrinsic sugar and they contribute to dental caries and weight gain. They are commonly sold in out of home settings. The Australian Dietary Guidelines define one serve of fruit juice with no added sugar as 125 ml (1/2 cup) and recommends only occasional consumption.</p>	

Type of recommendation	Specific recommendation	IBPGWG decision
	<p>Include formulated beverages (as defined by the Food Standards Code)</p> <p>Rationale: Captures non-carbonated sweetened beverages (e.g. iced tea).</p>	
	<p>Exclude intensely sweetened beverages, and frappes, iced tea and bubble tea if not sweetened</p> <p>Rationale: These beverages do not contribute to discretionary energy intake.</p>	
	<p>Separate milk-based and water-based sweetened beverages into separate categories</p> <p>Rationale: Sweetened beverages with substantive additions (e.g. milk-based fruit smoothies) have a significantly different nutrient profile than water-based sweetened beverages (e.g. cola soft drink).</p>	
	<p>Remove brand names from the list of inclusions and exclusions</p>	<p>Noted. These will be removed.</p>
	<p>Define soft drinks and energy drinks as per the Food Standards Code</p>	<p>Noted. The definition has been amended.</p>
	<p>Amend name to 'chilled sweetened beverages' to better reflect the exclusions</p>	<p>The category name has been amended to 'Chilled Beverages', reflecting the exclusion of hot beverages and the inclusion of fruit juice (which is not 'sweetened').</p>
<p><b>Amend serving size</b></p>	<p>Make allowance for beverages containing ice</p> <p>Rationale: Three industry respondents noted that many beverages purchased in the out of home sector in cups also contain ice which takes up a lot space, therefore the cup size doesn't necessarily dictate the volume of beverage it contains.</p>	<p>The serving size of 450 ml applies to beverages with and without ice. This ensures cup sizes are standardised for implementation, and serving sizes are not overly large.</p>

Type of recommendation	Specific recommendation	IBPGWG decision
	Align with Eat for Health discretionary serve size of 600 kJ  Rationale: Public Health groups concerned the maximum serving sizes are too large and should be aligned with the Eat for Health discretionary serve size.	It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size and it is not expected that these will align in all situations.
	Plan further reductions to reach a recommended serving size of no greater than 375 ml within 6 years  Rationale: Dietitians Australia recommend the serving size is aligned with the Eat for Health discretionary serve size, while acknowledging that large reductions are unlikely to be accepted by consumers.	The IBPGWG recommends the serving sizes in the Guide are reviewed regularly or when new data is available.

#### Existing Serving Size Guidance and Initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

- School canteen and state government healthy food guidance policies provide guidance for these types of products. These include but are not limited to:
  - Healthy Options WA Food and Nutrition Policy
  - The NSW Healthy School Canteen Strategy Food and Drink Criteria
  - Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Framework
  - Healthy choices: food and drink classification guide: A system for classifying foods and drinks (Vic Health)
  - Smart Choices (QLD)
  - The Australian National School Canteen Guidelines
- The current industry agreed standardised serve size for pre-packaged beverages is 600 mL for products less than or equal to 600 ml, or 250 ml for products greater than 600 ml.
- the Eat for Health Educator's Guide lists 375 ml of soft drink as an example serve of discretionary food.
- The COAG Health Council *Promoting and supporting healthy food and drink choices in hospital and healthcare facilities* states that serving size limits should be applied to sugar-sweetened beverages to better align with Australian Dietary Guidelines recommendations.

#### Other concerns

One concern identified is that customers' expectations on serving sizes in the out of home sector present a significant challenge to reducing serving size. The importance of promoting the Best Practice Guidance broadly across all industry sectors and aligning all stakeholders was noted. Broad sharing of the Best Practice Guidance with food industry, retailers, convenience retailers and the out of home sector will help to overcome these challenges.

Three industry respondents noted that many beverages purchased in the out of home sector in cups also contain ice which takes up a lot space, therefore the cup size doesn't necessarily dictate the volume of beverage it contains. In addition, frozen carbonated beverages expand to almost double the volume when dispensed and the nature of freezing means the water components of the drink expand and occupy more of the space in the cup. Therefore, a 500 ml cup may only contain 250 ml of beverage as the rest is air/carbon dioxide.

Woolworths noted the serving sizes are limited by the size of packaging (cups) available through their suppliers. However, they also note that to meet the current maximum recommendation would simply require the removal of their largest offering and so could be overcome.

## 7. Pizza: Out of home

### Definition

Pizza base, with toppings (e.g. vegetable, cheese, meat, fish or alternatives) sold in the out of home sector.

**Table 8: Consultation recommendations and IBPGWG decisions – Pizza**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Clarify definition</b></p> <p>10/27 respondents answered</p> <p>- 7 support the definition</p> <p>- 3 did not support</p>	Specify in definition that it applies to OOH only, and whole pizza or slices	<p>The definition clearly states the category applies to the out of home sector. The definition has been amended to specify that the pizza may be sold whole or as individual slices.</p> <p>The Best Practice Guide will include specific guidance that 200 g equates to roughly 2-3 slices or 1 small pizza.</p>
	Clarify the inclusion or exclusion of ready to eat pizza sold in retail stores	Retail 'On the Go' products are included.
	<p>Align with Eat for Health discretionary serve size of 600 kJ</p> <p>Rationale:</p> <p>Many Public health groups and academics found the recommended serving size to be too large and recommend the serving size for this category should align with the Eat for Health discretionary serve size of 600 kJ. A 200 g serving of pizza provides more than 3 discretionary serves on average.</p>	It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.

### Serving size

WA Health cited social and personal norms for appropriate serving sizes are shaped by what consumers see in retail and out of home<sup>4</sup>. Professor Clare Collins noted that based on a slice of pizza weighing about 75 g, the serving size could be reduced.

Dietitians Australia agreed with the recommended serving size of 200 g, stating it appears reasonable considering pizza is typically consumed as a meal.

### Technical considerations

No technical constraints related to reducing the serving size of this category were cited by respondents.

### Other concerns

Woolworths believes reducing the serving size of this category (especially when product packaging may not be labelled with nutrition or serving size information) will be difficult, except for products which are obviously mini sized and aimed at one person to consume in a single occasion. For large sharing pizzas, Woolworths has noticed that most companies will list the serving size as one slice, which although falls well within the guidelines, does not represent a realistic portion size for most people. Consumer education and industry guidance may help to overcome these challenges.

### Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

- Woolworths sells mini pizzas in their metro stores with approximately 180-200 g serving sizes.
- Most pizzas are pre-cut into slices as indication of portions
- All QSRs provide menu board labelling and full nutrition information on-line and via App

### Other Serving Size Guidance and Initiatives

WA Health notes that the Eat for Health resources recommend a serve size of discretionary food is equivalent to 600 kJ (approximately 50 g or one small slice of pizza).

Western Australia, Queensland, Victoria and South Australia have mandatory healthy food and drink policies that include a maximum serve size as sold (200 g, 200 g, 200 g and 250 g, respectively) combined with a nutrient criterion to account for energy, saturated fat and sodium for pizza sold out of home.

## 8. Potato products (i.e. chips and fries): Out of home

This category was renamed 'Hot potato chips, fries and wedges' post-consultation.

### Definition

Potato or sweet potato-based products designed to be consumed as a snack or side dish with or without added seasonings or fat and sold in the out of home sector. Excludes potato-based meals or cold potato-based snack foods.

This definition was clarified following public consultation to: "Potato or sweet potato-based products designed to be consumed as a snack or side dish and sold in the out of home sector. Excludes potato-based meals or cold potato-based snack foods".

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4 Marteau, T, Hollands, G, Sheemilt, I, and Jebb, S. 2015. Downsizing: policy options to reduce portion sizes to help tackle obesity. *BMJ* 351:h5863 doi: <https://doi.org/10.1136/bmj.h5863>

**Table 9: Consultation recommendations and IBPGWG decisions – Potato products**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Amend definition</b></p> <p>12/27 respondents answered</p> <p>- 6 support the definition</p> <p>- 6 did not support</p>	<p>Include other hot potato-based snacks such as hash browns, pommies, puffs, balls, noisettes, fritters, potato cakes and gems.</p> <p>Rationale: These are commonly found in the out of home sector and have similar nutritional value to and are consumed similarly to potato chips and wedges.</p>	<p>These products did not part of original scope or data analysis which informed the recommended maximum serving size. As the food supply changes, the IBPGWG recommend reviewing this category.</p>
	<p>Include similar products made from parsnips, turnips and other starchy vegetables.</p> <p>Rationale: These vegetables have a similar nutrition profile to potatoes and would be consumed similarly.</p>	<p>Products made from other starch vegetables were not considered in the analysis as they are categorised separately under the National Nutrition and Physical Activity Survey 2011-12 from which the priority food categories were determined. As the food supply changes and more recent consumption data becomes available, the IBPGWG recommend reviewing this category.</p>
	<p>Exclude dehydrated and frozen mash potato products.</p>	<p>Definition has been clarified.</p>
<p><b>Clarify definition</b></p>	<p>Clarify inclusion of ready to eat products sold in retail stores.</p>	<p>Retail 'On the Go' products are included.</p>
	<p>Clarify inclusion of potato crisps or potato chips.</p>	<p>Definition has been clarified.</p>
	<p>Include additional detail regarding the meaning of "added seasonings or fat". For example, does it include added cheese or meat.</p>	<p>The definition has been amended. Additions include herbs and spices, not additional foods such as cheese or meat.</p>
<p><b>Amend serving size</b></p>	<p>Align with Eat for Health discretionary serve size of 600 kJ</p>	<p>It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.</p>

### Serving size

Dietitians Australia agreed with the recommended servings sizes in the guide, noting they seem appropriate and all result in a serving size and energy content decrease.

WA Health disagrees with the recommended serving size, noting a 150 g serving of hot potato chips provides between 2 to 3 discretionary serves i.e. the maximum recommended number of serves per day for an adult who requires additional energy and while they acknowledge consumer preference is important for industry, it should not be the key driver of public health recommendations and policy.

### Technical considerations

One technical consideration was cited: dispensing tools and packaging may need to be changed.

### Other concerns

One concern cited by respondents was reducing the serving size of this category may be challenging for potato products sold as part of meals which are often sold as small, medium or large, with each size applying to each component of the meal, e.g. large burger, large drink and large fries. They note that it is unlikely a company would reduce the size of the fries when the other components remain the same. A whole of industry commitment which enables a consistent approach is required to overcome these challenges.

### Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

- Woolworths has standardised its range of fries and wedges into 3 sizes, small (300 g), medium (400 g) and large (500 g) and displays kilojoule labelling on shelf tickets/menu boards.
- All QSRs provide menu board labelling and full nutrition information on-line and via Apps to help consumers make informed purchasing decisions at the point of sale. While small, medium (regular) and large serving sizes are available at most QSRs, regular serving sizes are the default offering, and staff do not actively promote large size options to customers.

### Other Serving Size Guidance and Initiatives

Sixty grams of hot chips is listed as an example serve of discretionary food in the Eat for Health Educator's Guide.

Queensland, Victoria and South Australia have a maximum serve size as sold criteria (150 g, 150 g and 250 g, respectively) combined with nutrient criteria to account for energy, saturated fat and sodium (not energy alone) for potato products sold out of home in their mandatory policies for healthcare settings.

The Western Australian School Canteen Association Handbook suggests a maximum serving size of 100 g, combined with a nutrient criterion to account for products high in energy, saturated fat and sodium (not energy alone).

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

*This category name was amended to "Savoury pastry products – pies, rolls and filled pastries" following public consultation.*

### Definition

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

This definition was clarified following public consultation to: "Any savoury filling encased in a pastry and sold in the out of home and retail sectors. Includes open top products".



**Table 10: Consultation recommendations and IBPGWG decisions – Savoury pastry products**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Amend definition</b></p> <p>12/27 respondents answered</p> <p>- 6 support the definition</p> <p>- 6 did not support</p>	<p>Replace ‘envelope’ with ‘filled pastry’, ‘pastry’ or ‘parcel’</p> <p>Rationale: Envelope is not standard or common terminology. Relace with ‘filled pastry’, ‘pastry’ or ‘parcel’.</p>	<p>The category name has been amended to replace the term ‘envelope’ with the term ‘filled pastries’.</p>
	<p>Include other proteins such as fish and legumes</p> <p>Rationale: Though these inclusions do not themselves have high saturated fat or energy compared to their red meat counterparts, they are still consumed in the same pastry case as part of the same occasion. This also promotes alignment to the Australian Dietary Guidelines and defined food groups.</p>	<p>The definition has been updated to include ‘Any savoury filling’ to be reflective of the inclusion criteria. The extended inclusions list has been amended to include other proteins such as fish and legumes. It was noted that the priority category was selected based on any savoury filled pastry rather than a specific pastry filling.</p>
	<p>Include culturally diverse foods (e.g. gozleme, samosas, pastizzi) under inclusions</p>	<p>The extended inclusions list has been amended to include culturally diverse foods like samosas and pastizzis in the inclusions criteria. Gozlemes are excluded as they are considered to be bread-based.</p>
	<p>Include ‘open top’ products</p>	<p>The category definition has been amended to included filled pastries with an open or closed top.</p>
	<p>Align definitions with those used in the Partnership Reformulation Program.</p> <p>Rationale: Different category definitions will result in increased administration to manage two different sets of criteria.</p>	<p>The definitions in the Guide will not be aligned to those used in the Partnership Reformulation Program as they were developed for different reasons and therefore are not applicable. Reformulation categories were developed with consideration of sodium and saturated fat content.</p>
<p><b>Clarify definition</b></p>	<p>Clarify inclusion/exclusion of savoury scrolls and pinwheels e.g. cheese pinwheel or vegemite scroll.</p>	<p>Savoury scrolls and pinwheels are excluded as these foods are considered</p>

Type of recommendation	Specific recommendation	IBPGWG decision
		to be bread-based and therefore were not included in the analysed data.  Savoury scrolls and pinwheels have been added to the extended list of category exclusions.
	Clarify if definition applies to supermarket ready to eat products	Retail 'On the Go' products are included.
<b>Amend serving size</b>	Reduce serving size to 180 g  Rationale: Dietitians Australia note that the recommended serving size for this category is the same as the 66th percentile 200 g and question effectiveness of the recommendation where the purpose of this guide is to encourage and support industry to reduce portion sizes. Dietitians Australia recommend a serving size of 180 g, as this would be a 10% reduction consistent with consumer acceptability, and would reduce energy content.	The recommended maximum serving size will remain at 200 g. This recommendation was set based on the 66 <sup>th</sup> percentile to reduce size creep of jumbo-sized savoury filled pastry products.
	Align with Eat for Health discretionary serve size of 600kJ  Rationale: WA Health note that the recommended serving size of 200 g (~1,800-2,000 kJ) is ~3-3.5 serves of a discretionary food.	It is not practical or appropriate to align the recommended serving size with the Eat for Health serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.

#### Technical constraints

No technical constraints were identified. As noted by one manufacturer, from a technical perspective there are no constraints as they have variability in the pistons used to fill the pastries which could be tightened if required.

#### Other concerns

Reducing the serving size will mean re-ranging the products with customers, costs of new artwork creative, plate printing costs, marketing, internal resources etc.

Products in the out of home sector are limited to what is available from suppliers/distributors. A retailer’s ability to implement the best practice guideline therefore relies on other food manufacturers to some degree. A whole of industry commitment which ensures there are readily available products that meet the best practice serving size will enable these challenges to be overcome.

Reductions in serving size may be met with resistance from consumers and industry initially. To generate awareness and support and effect meaningful change, consumers require information about how many discretionary serves they are consuming, in the context of the Australian Dietary Guidelines recommendations. Industry reformulation of this category to reduce the energy content (and other nutrients of concern) per serving size should also be prioritised.

Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes. One manufacturer noted they clearly display weight and serving size information on packaging. The majority of their products are less than the recommended serving size of 200 g (between 140 g-170 g, representing 84% of volume sold). For products above 200 g, the maximum serve weight in the portfolio is 210 g. This slight increase in weight delivers a premium product relative to mainstream, through more inclusions of fillings.

Woolworths offers mini / party size pies and sausage rolls for entertaining, which are also more appropriate sizes for children as a treat. Woolworths also provides serving size descriptions on the nutrition information panel (e.g. Serving size: 46 g (1 pie)) and indicates the number of servings per pack for large quiches and pies.

Other Serving Size Guidance and Initiatives

The Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit has portion size guidelines for pies, sausage rolls and pasties. The portion guideline ranges between 120 g-250 g.

## 10. Sweet Biscuits: Retail

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.

This definition has been revised following public consultation, to: “All sweet biscuits sold in retail. Includes products which are coated or uncoated, filled or unfilled. Includes packet baking mixes”.

**Table 11: Consultation recommendations and IBPGWG decisions – Sweet biscuits: Retail**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Amend definition</b></p> <p>13/27 respondents answered</p> <p>- 6 support the definition</p> <p>- 7 did not support</p>	<p>Include packet baking mixes and cookie doughs</p> <p>Rationale:</p> <p>These products have a similar nutritional content to ready-to-eat products.</p>	<p>Agreed, category definition has been amended. This approach aligns with the revised approach to include baking mixes in Cakes, Muffins and Slices category. Current serving sizes of baking mixes are comparable to other biscuit types (e.g. choc chip cookie baking mix serving sizes range from 29 g-44 g).</p>

Type of recommendation	Specific recommendation	IBPGWG decision
	<p>Include breakfast biscuits</p> <p>Rationale: These products are sweet biscuits ranging in flavours of chocolate, chocolate chip, honey, nuts, etc. Other jurisdictions (NSW) specifically include breakfast biscuits in the category of sweet biscuits in their healthy food and drink policies in healthcare settings.</p>	<p>These products are excluded due to differences to other types of sweet biscuits. In addition, these products did not form part of the consumption data from which the priority categories were determined. For consideration for future work when updated consumption data is released.</p>
	<p>Specifically exclude products like Breakfast Bakes</p> <p>Rationale: These are a baked breakfast biscuit with whole grain and fibre, fortified with vitamins and minerals, and positioned as a breakfast choice.</p>	<p>These are excluded. See extended list of category inclusions and exclusions.</p>
<p><b>Amend serving size</b></p>	<p>Larger target for single serve biscuits (e.g. 60 g)</p> <p>Rationale: Woolworths recommends single serve biscuits are given the same maximum target as out of home biscuits (60 g) as this is more aligned to the type of product being sold. Single serve biscuits would be difficult to reduce to 30 g and still look appealing and / or of value to customers. To overcome this, products could be labelled as 'Serves 2 or more', however this may not result in any change as to how the product is consumed.</p>	<p>These products are included, unless sold as a retail 'On the Go' product where the out of home serving size would apply.</p>
	<p>Align serving sizes for out of home and retail sectors</p> <p>Rationale: Respondents from both industry and public health questioned the differences in the recommended serving sizes for the out of home and retail sectors. One</p>	<p>Not appropriate. Data shows typically product offerings have very different serving sizes between two sectors</p>

Type of recommendation	Specific recommendation	IBPGWG decision
	respondent suggested standardising the serving sizes would provide consistency for consumers on expected serving sizes.	
	Align with Eat for Health s discretionary serve size of 600 kJ	The serving size of 30 g aligns with the Eat for Health discretionary serve in most situations (600 kJ or approximately 2-3 sweet biscuits).

### Technical considerations

Two technical constrictions were identified.

- Breakfast biscuits such as the belVita core biscuits range have been designed for breakfast occasions with a larger serving size of 50 g, providing a source of fibre and wholegrains on each portion. It would be extremely difficult to provide a source of fibre and wholegrains at a serving size of 30 g without significant reformulation.
- Reducing the serving size can require significant changes to manufacturing processes. Biscuits are made to tight specifications, which includes everything from dough mixing speeds, size and shape of moulds and cutters, baking temperatures and times and packaging. Any changes to serve size will impact all these processes and would require extensive resource, time and trials to adjust to ensure overall line efficiency and product integrity is maintained.

### Other concerns

Woolworths also recommends the best practice guide provides guidance as to when reducing the number of pieces is preferred over exceeding the best practice guideline. For example, for larger cream filled biscuits, is it better to align all biscuits to 2 biscuits per serve or have some as one biscuit and others as 2 biscuits in order to stay under the maximum of 30 g.

### Current initiatives

Respondents were asked to provide details of current initiatives related to serving sizes.

- Retailers offer mini sized cookies which are more suitable for children as well as individually portioned packs ranging from 22.5 – 25 g per pack. The approximate number of cookies per serving are usually included in the description in the nutrition panel to help consumers understand what the suggested serving size relates to.
- Mondelez have a global commitment to adopting 'Mindful Snacking' icons on 100% of their packages by 2025, including the sweet biscuit category. The Mindful Snacking icon consists of a visual representation of what a portion is (e.g. 3 biscuits) and the energy content of each portion.

### Other Serving Size Guidance and Initiatives

- The Eat for Health Educator Guide lists 2-3 sweet biscuits as an example serve of discretionary foods (600kJ). Two biscuits are likely to be much closer to the 30 g proposed serving size and 600 kJ as opposed to 3, based on the current range of products in this category.
- Other jurisdictions recommend sweet biscuits are sold in portions of 40 g or less, in their mandatory healthy food and drink policies in healthcare settings (Queensland, Victoria, South Australia).

## 11. Sweet Biscuits: Out of home

Definition

All sweet biscuits sold in the out of home sector. Includes products which are coated or uncoated, filled or unfilled.

**Table 12: Consultation recommendations and IBPGWG decisions – Sweet biscuits: OOH Sector**

Type of recommendation	Specific recommendation	IBPGWG decision
<p><b>Amend serving size</b></p> <p>10/27 respondents answered</p> <ul style="list-style-type: none"> <li>- 6 support the definition</li> <li>- 4 did not support.</li> </ul>	<p>Align serving sizes for out of home and retail sectors</p> <p>Rationale: Respondents from both industry and public health questioned the differences in the recommended serving sizes for the out of home and retail sectors. One respondent suggested standardising the serving sizes would provide consistency for consumers on expected serving sizes. Public Health respondents recommended reducing the serving size for the out of home sector to align with the Australian Dietary Guidelines recommended serve sizes.</p>	<p>Not appropriate. Our data shows typically product offerings have very different serving sizes between two sectors</p>
	<p>Align with Eat for Health discretionary serve size of 600 kJ</p>	<p>It is not practical or appropriate to align the recommended serving size with the Eat for Health discretionary serve size of 600 kJ. A serve size is different to a serving size. In addition, customer acceptance would likely be poor if the change is too great.</p>
	<p>Plan further reductions over time</p> <p>Rationale: Dietitians Australia did not agree that 60 g is 'best practice' for serving size. However, they acknowledged the different consumption habits in different settings. Dietitians Australia recommend serving sizes for sweet biscuits in the out of home sector are gradually decreased.</p>	<p>The IBPGWG support nudging serving size in the right direction. The IBPGWG recommends the serving sizes in the Guide are reviewed regularly.</p>

Serving size

WA Health notes that social and personal norms for appropriate serving sizes are shaped by what consumers see in retail and out of home<sup>5</sup>. The recommended serving size appears to be based on current consumer behaviours. Reductions in serving size may be met with resistance from consumers and industry initially. While consumer preference is important for industry, it should not be the key driver of public health recommendations and policy.

#### Technical considerations

No technical constraints related to reducing the serving size of this category were cited by respondents.

#### Other Serving Size Guidance and Initiatives

The Eat for Health Educator's Guide lists 2-3 sweet biscuits as an example of one serve of discretionary foods (equivalent to 600 kJ) however this is not likely to represent out of home biscuits which tend to be much larger than those sold in the retail sector.

Other jurisdictions recommend sweet biscuits are sold in portions of 40 g or less, in their mandatory healthy food and drink policies in healthcare settings (Queensland, Victoria, South Australia).

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<sup>5</sup> Marteau, T, Hollands, G, Sheemilt, I, and Jebb, S. 2015. Downsizing: policy options to reduce portion sizes to help tackle obesity. BMJ 351:h5863 doi: <https://doi.org/10.1136/bmj.h5863>

## Part B - Best Practice Guide

This section relates to the example pages of the Guide (Appendix A) that were provided with the consultation. There were 19 responses to this section of the consultation. Respondents were asked what they liked about the examples, and what things they would change. They were also asked to comment on the usefulness of the included information and the use and distribution of the Guide.

Note: There was some confusion as to the target audience for the Guide. There were a number of comments which expressed concern regarding how the discretionary serves might be understood or perceived by a consumer. However, the Guide is not intended to be a consumer-facing document. The primary audience is the food industry.

### Feedback on the look and feel of the example pages

Aspects of the examples that respondents liked included:

- Clear and easy to understand format
- Easy to read font
- Comparison with real-life objects for relatable serving size guidance
- Balance between text and images
- Practical tips given for implementation of the guidelines
- Inclusion of hyperlinks
- Use of infographics
- Information is spaced out well with clear distinction between different elements of information to allow easy reading.
- Using words “up to” to depict a maximum recommendation rather than a suggested serving size
- The calculation of discretionary serves (although full context has not been provided)
- The use of the plate visual and the serving suggestion of “fill  $\frac{3}{4}$  of plate with salad or vegetables” is an important component of the guide to demonstrate that these foods should be consumed alongside minimally processed whole foods.

Constructive feedback on the examples included:

- Make it clear whether the real-life comparison objects are referring to size or weight.
- Change the wording from "Consider if serving size reduction is right for your category" to wording that encourages a review of current portion sizes. E.g. "Do your products in this category need a serving size reduction?"
- Include images of the suggested serving scenario. i.e. one small pie served with salad or one small slice served with fruit. This will encourage users to think about what other healthy options they could include with their discretionary foods to add value to their customers (rather than just reducing the serving size). If not possible here, would recommend adding to the "Top Tip" or "Tips for Successful Implementation" section.
- Consider each resource being a different colour. This will help usage for customers that need multiple resources based on their menu or portfolio.
- In the frozen desserts, ice cream and ice confection category, images of more than 1 product type may be needed due to diversity of products in this category.
- Include evidence-based marketing principles and techniques to underpin the “tips for successful implementation”. At present, only one of these is supported with evidence (10% reduction) and it doesn’t apply across all categories.



- The George Institute is concerned the look, feel and layout presents discretionary foods as a healthy and positive addition to the diet. To avoid the public misinterpreting the message, The George Institute recommends:
  - o The guide should include a statement that “discretionary foods should be eaten only sometimes and in small amounts”.
  - o The guide should not have a green background as this colour is often associated with good health. The George Institute recommends a different colour should be used, such as red or yellow.
- Photography – commission a food stylist and professional photographer to take photos of different food products
- Clarity required for discretionary foods icon and number of discretionary serves.
- Insert a glossary of definitions and background on what a discretionary food choice is at the front of the guide
- Incorporate the information in the Guide into a QR code which hosts all of the technical information.
- The visual representations which show the comparison of the serving size to credit cards, tennis balls etc are more consumer focused than industry focused and are not particularly useful for food businesses.
- A link with reformulation targets for relevant categories would assist industry and provide a holistic view of what they could (or should) be doing in each category.
- Dietitians Australia suggested that food manufacturers could clearly indicate the number of Australian Dietary Guidelines discretionary serves each product contains, stating that the food industry has demonstrated knowledge and capacity to do this, promoting fruit and vegetable serves on several products.

## Usefulness of information to be included

Respondents were asked to rate the usefulness (helpful, neutral or unhelpful) of 8 pieces of information proposed for inclusion in the Guide.

**Table 13: Usefulness of information proposed for inclusion**

Information	Helpful (%)	Neutral (%)	Unhelpful (%)
Category definition	100	0	0
Serving size recommendations	100	0	0
Tips and tricks – category specific	94	0	6
Guiding principles for resizing:	78	17	6
How to review the serving size information on labels of products	56	44	0

Information	Helpful (%)	Neutral (%)	Unhelpful (%)
How to indicate a smaller serving size on pack	56	28	17
Case studies	83	17	0
Rationale for the serving size recommendation	78	22	0

## Access, distribution and promotion

Respondents indicated they would likely access the Guide by viewing online as well as downloading and printing copies. It was also noted that the Industry Best practice Guide should be available in a high-resolution format that could be printed and displayed in food preparation areas.

Suggested channels for promoting the Guide included: Healthy Food Partnership Website; public health sector/non-government organisation peak bodies; industry peak bodies; forums; directly to supermarket retailers, convenience stores and out of home/food service providers; bodies representing cafés, restaurants and convenience stores; sales pathways where nutrition communications are required; and social media.

## Part C - General Comments

The following are general comments received from respondents that are not directly related to individual food categories.

### Serving Size Recommendations

Cancer Council Australia supported by NSW Cancer Council, Global Obesity Centre (GLOBE), Deakin University, the Heart Foundation, The George Institute and PHAA advocates for a serving size equivalent to the Eat for Health discretionary serve of 600 kJ across all categories. The reasoning given is outlined below:

- The Australian Dietary Guidelines recommend that energy-dense discretionary foods should be limited within a nutritious dietary pattern. The food categories in the Guide are discretionary foods and as such serving sizes should align with the Australian Dietary Guidelines and how they would be interpreted by consumers. For example, snacks should be kept to 600 kJ.
- Additionally, we are concerned that 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 states it refers to and the purpose of the original guidance it is referring to.

Queensland Health and WA Health also support the view that the recommended serving size for all food categories should be based on the Eat for Health discretionary serve of 600 kJ.

Dietitians Australia does not agree that the Guide outlines true best practice. Their opinion is that best practice would be to reduce all portion sizes to size where they provide 600 kJ of energy, equal to one discretionary serve. Dietitians Australia recommends the guide should be retitled to reflect this, removing 'best practice'. For example, 'Guide to voluntary serving size reduction'. The Guide's title has been amended to this effect.

### Consumer education

The Ai Group and the AFGC recommend the Guide be complemented by government-led and funded consumer education on broad dietary advice, dietary construction, quantity and frequency. The need for consumer education was also identified by Nestlé, Woolworths, FBIA and the NZ FGC.

WA Health recommends consumer education on discretionary serves. To generate awareness, support and effect meaningful change, consumers require information about how many discretionary serves they are consuming, in comparison to the Australian Dietary Guidelines recommendations.

It was noted by respondents that reductions in serving size will likely be met with resistance from consumers and industry initially. To generate awareness and support and effect meaningful change, consumers require information about how many discretionary serves they are consuming, in comparison to the Australian Dietary Guidelines/Eat for Health recommendations. Without education, such as comparison to the appropriate serving size, consumers will likely continue over-consuming without knowing what is appropriate and likely continue to resist change.

### Criticism of the method used to determine the recommended maximum serving sizes

Queensland Health was critical of the method used to determine the recommended maximum serving sizes. It is the opinion of Queensland Health that while using the 66<sup>th</sup> percentile of current serving sizes to determine the maximum recommended serving size may be more supported by industry, there is no incentive to reduce serving sizes for companies whose products are currently smaller.

# CAKES, MUFFINS, SLICES



Ready-to-eat freshly baked, frozen or shelf-stable.  
Excludes pre-packaged baking mixes.

SOLD IN:  Retail

## SERVING SIZE RECOMMENDATION:



**UP TO 90g** OR 1 DECK OF CARDS



**UP TO 90g** OR 1 TENNIS BALL



**UP TO 45g** OR 1 CREDIT CARD



### Why this serving size?

- Recognises category portion sizes have increased over time.<sup>1</sup>
- Accounts for differences in servings within sub-category informed by [market research](#).<sup>2</sup>
- Aligns with State and Territory Government Guidance.<sup>3,4</sup>

 = 1-2.5  
**DISCRETIONARY SERVES<sup>5</sup>**

The serving size recommendation is equal to 1-2.5 discretionary food serves.<sup>5</sup>

## WHERE CAN YOU START?



**CONSIDER** if serving size reduction is right for your category.



**CONDUCT** a market assessment and create an action plan with realistic timelines.



**INVESTIGATE** mini or medium sized products as point of difference.



**REVIEW** whether serving size has increased over time. Can you revert to a smaller serving?



**RETHINK** how you serve or package products. Consider individual portions and cutting cue lines on whole cakes or outer packaging.

## TIPS FOR SUCCESSFUL IMPLEMENTATION



- ✓ Gradually phase in new products to increase consumer acceptance.
- ✓ Consider competitive pricing to avoid 'shrinkflation' (smaller products, same price).
- ✓ Plan promotions to help nudge consumers to the appropriate choice.
- ✓ Start with a 10% reduction in serving size as research shows it could go unnoticed.<sup>7</sup>
- ✓ Provide pre-portioned cakes, muffins and slices.



### TOP TIP

Pre-portioned cakes, muffins and slices encourage consumers to reduce their discretionary food intake.



## NEED HELP OR MORE INFORMATION?

- Explore the [other categories](#) and [Healthy Food Partnership materials](#)
- Australian Dietary Guidelines | [Eat For Health](#)
- The Institute of Grocery Distribution (IGD) | [Portion size and Sizing up the opportunity: setting portion size](#)
- Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit | [Healthy Eating Active Living](#)
- Health choices food and drink classification guide 2020 | [Department of Health, Victoria](#)
- Background on methodology and category definitions found in [Chapter 1: Healthy Food Partnership: Industry Best Practice Guide for Serving Size – Backgrounder and Methodology](#)

## REFERENCES

- <sup>1</sup>Zheng et al. Changes in Typical Portion Sizes of Commonly Consumed Discretionary Foods among Australian Adults from 1995 to 2011-2012. *Nutrients*. 2017; 9 (6):577.
- <sup>2</sup>Liang S, Gemming L, Wellard-Cole L and Rangan A. Comparison between serving sizes of cakes and muffins sold in Australian supermarkets and coffee shop chains. *Nutrition & Dietetics*. 2019; 76:284-289.
- <sup>3</sup>NSW Ministry for Health. Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit. 2017.
- <sup>4</sup>Health Vic. Healthy choices classification guide 2020 update - Summary of changes. 2020.
- <sup>5</sup>National Health and Medical Research Council. Australian Dietary Guidelines. Canberra: NHMRC. 2013.
- <sup>6</sup>A discretionary food serve is equal to 600kJ.
- <sup>7</sup>IGD. Sizing up the opportunity: a guide to setting portion size. 2019.





# SAVOURY PASTRIES

Pies, Rolls and Envelopes.

Pastry filled with:  Meat  Poultry  Vegetable

SOLD IN:



Out of home



Retail



## SERVING SIZE RECOMMENDATION:

UP TO 200g



OR 1  
BASEBALL



### Why this serving size?

- Aligns with State and Territory Government Guidance.<sup>1,2</sup>
- A pastry is typically consumed as a meal rather than a snack.
- A pastry is usually consumed as one serving.
- Based on the typical serving size consumed by Australians.<sup>3</sup>

Serving suggestion:  
Fill  $\frac{3}{4}$  of plate with salad  
or vegetables



 = 3-3.5  
**DISCRETIONARY SERVES<sup>4</sup>**

The serving size recommendation is equal to 3-3.5 discretionary food serves.<sup>5</sup>



## TOP TIP

Try using visual descriptors on the menu to make a new savoury pastry item stand out as a positive choice. Instead of beef pie, try adding sensory cues like, "Slow cooked Angus Beef and red wine pie with honey glazed carrots and winter garden greens".

## WHERE CAN YOU START?



**CONSIDER** if serving size reduction is right for your category.



**CONDUCT** a market assessment and create an action plan with realistic timelines.



**INVESTIGATE** options with current or new suppliers to develop and trial new recipes with in-house baking.



**REVIEW** sales data, customer feedback and plate wastage to determine if serving size change will impact the business.



**PILOT** new products or prototypes and evaluate impact.

## TIPS FOR SUCCESSFUL IMPLEMENTATION



- ✓ Gradually phase in new products or menu items to increase consumer acceptance.
- ✓ Consider competitive pricing to avoid 'shrinkflation' (smaller products, same price).
- ✓ Plan promotions to help nudge consumers to the appropriate choice.
- ✓ Satisfy consumers by serving with  $\frac{3}{4}$  plate of vegetables or salad and consider reduced sized plates.
- ✓ Offer condiments such as sauces, chutneys and relishes.



### TOP TIP

Investigate reducing savoury pie and filling height by experimenting with deep pie moulds, tins or cases.



## NEED HELP OR MORE INFORMATION?

- Explore the [other categories](#) and [Healthy Food Partnership materials](#)
- Australian Dietary Guidelines | [Eat For Health](#)
- The Institute of Grocery Distribution (IGD) | [Portion size and Sizing up the opportunity: setting portion size](#)
- Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit | [Healthy Eating Active Living](#)
- Health choices food and drink classification guide 2020 | [Department of Health, Victoria](#)
- Background on methodology and category definitions found in [Chapter 1: Healthy Food Partnership: Industry Best Practice Guide for Serving Size – Backgrounder and Methodology](#)

## REFERENCES

<sup>1</sup>NSW Ministry for Health. Healthy Food and Drink in NSW Health Facilities for Staff and Visitors Toolkit. 2017.

<sup>2</sup>Health Vic. Healthy choices classification guide 2020 update - Summary of changes. 2020.

<sup>3</sup>Zheng et al. Changes in Typical Portion Sizes of Commonly Consumed Discretionary Foods among Australian Adults from 1995 to 2011-2012. *Nutrients*. 2017; 9 (6):577.

<sup>4</sup>National Health and Medical Research Council. Australian Dietary Guidelines. Canberra: NHMRC. 2013.

<sup>5</sup>A discretionary food serve is equal to 600kJ.





## Appendix B – Summary of additional targeted consultations

### Background

Following the public consultation, the Department of Health undertook further targeted consultation on the *Cakes – Out of home* category and the *Chilled Beverages – Out of home* category (formerly *Sweetened Beverages – Out of home*), contacting the respondents who provided comments on these categories to the public consultation. The purpose was to provide visibility of and seek additional feedback where, in response to the public consultation submissions, the IBPGWG proposed a significantly revised serving size or food category definition.

This appendix provides a summary of the responses to the targeted consultation and the IBPGWG’s considerations regarding the proposed serving size recommendations and food category definitions.

### Cakes – Out of Home

The IBPGWG decided to sub-divide the cakes category in the out of home sector due to significant differences in serving size. The IBPGWG found the median serving size of heavy-style cakes (mud cakes and cheesecakes) to be significantly larger than other cake styles<sup>6</sup>. Therefore, a separate subcategory for heavy-style cakes such as mud cakes and cheesecakes was recommended.

The targeted consultation was emailed to the nine respondents to the public consultation on Cakes: OOH. Five responses were received: 3 from public health and 2 from industry. A summary of the 5 responses received is provided below. Due to the small number of responses from industry, and noting that one requested their submission was not published, neither industry respondent is identified.

#### Summary of responses

**Table 13: Targeted consultation recommendations and IBPGWG decisions – Cakes: OOH Sector**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>	<p>Include brownies in the heavy weight cakes sub-category.</p> <p>Rationale: Brownies 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 (e.g. large serving sizes).</p>	The mean and median serving size of brownies in the out of home sector is 75 g. As a slice, the maximum recommended serving size is 90 g. If brownies were included in the heavy weight cake category, the maximum serving size recommendation would be 150 g.
	<p>Include sticky date pudding in the light-medium cake category.</p> <p>Rationale: Dietitians Australia acknowledge that puddings are categorised as</p>	Puddings were not considered in the analysis as they are categorised as desserts under the National Nutrition and Physical Activity Survey 2011-12 from which the priority food categories were determined.

<sup>6</sup> Liang S, Gemming L, Wellard-Cole L, Rangan A. Comparison between serving sizes of cakes and muffins sold in Australian supermarkets and coffee shop chains. *Nutr Diet*. 2019 Jul;76(3):284-289. doi: 10.1111/1747-0080.12544. Epub 2019 May 2. PMID: 31050115.

Type of recommendation	Specific recommendation	IBPGWG decision
	<p>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 (e.g. 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.</p>	<p>The IBPGWG acknowledges that puddings are nutritionally similar to cakes, however desk top research indicates sticky date pudding is more likely to be served and marketed as a pudding/dessert in the out of home sector.</p>
<b>Clarify definition</b>	<p>Condense extended definition terms especially in instances where "all flavours" are specified, it is then unnecessary to list multiple flavour variants</p>	<p>Definition has been amended.</p>
	<p>Table 2 could succinctly express the exclusions as "All items included / excluded as Table 1: Cakes – Heavy Weight – Out of home" rather than repeat the lists, where these are identical.</p>	<p>The definitions should be comprehensive for each sub-category so that they can be viewed individually.</p>
	<p>For clarity, the following statement could be optimally worded as follows:</p> <p>'Excludes <i>hybrid</i> cake products which combine an excluded item with an included item, e.g. Duffins (donut muffins).'</p>	<p>Definition has been amended.</p>
	<p>'Cupcakes with or without a frosting or a coating' are included in both the 'heavy weight cakes' and 'light-medium cakes' which appears to be an error.</p>	<p>Mud cake style cupcakes are intended to be included with heavy weight cakes. These are simply smaller versions of mud cakes.</p>

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend serving size</b>	Maintain single category and serving size recommendation of 125 g	Not agreed; the decision to divide the category has been made based on evidence that the serving size of heavy-style cakes is significantly larger than other cake styles.
	Consider applying sub-categories to cakes sold in the retail sector	The data does not support sub-categories in the retail sector.
<b>Other recommendations</b>	Include a planned timeline for further reductions. For example, reduce serving sizes by 10% every 2 years to match targets to the smaller serving sizes for cakes, muffins and slices in the retail sector	The IBPGWG recommends the serving sizes in the Guide are reviewed regularly.

### Support for proposed changes

The 2 industry respondents support the revised sub-categories and serving sizes proposed for cakes in the out of home sector. One of these respondents recommend the sub-categories are applied and/or reviewed in relation to cakes sold in the retail sector. Dietitians Australia support the revised sub-categories; however, they 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 one serving of cake or one muffin. Dietitians Australia 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.

### Opposition to proposed changes

The George Institute and WA Health do not support the proposed change to create separate subcategories and recommended serving sizes for cakes in the out of home sector.

The George Institute believes that serving size recommendations should be aligned with public health priorities, rather than dictated by current serving sizes on the market. The George Institute is also concerned that setting different serving sizes for this category could create misunderstanding amongst consumers and send the wrong public health message, i.e., that heavy weight cakes are healthier than light-medium weight cakes because they are allowed to be consumed in larger quantities.

WA Health state it is unclear whether recommending a larger serving size for ‘heavy weight cakes’ (150 g) is to allow for their greater density whilst providing a serving size (in terms of *dimensions, volume, or appearance*) that is similar to ‘light-medium weight cakes’ (125 g) as this is likely to be more acceptable to consumers; or if this proposal is simply to maintain the current practice of these cakes being served in larger sizes. WA Health’s preference would be for ‘heavy weight’ and ‘light-medium weight’ cakes to have the same serving size for uniformity, and to account for the greater energy density of ‘heavy weight cakes’.

## Sweetened Beverages – Out of Home

The category name and definition were amended (from “sweetened beverages” to “chilled beverages”) to make it clear that the category includes all chilled beverages and that hot beverages are excluded.

The targeted consultation was emailed to the 14 respondents to the public consultation on Beverages: OOH. Seven responses were received: 3 from public health, and 4 from the food industry. A summary of the responses received is provided below.

Summary of responses

**Table 14: Targeted consultation recommendations and IBPGWG decisions – Chilled Beverages: OOH**

Type of recommendation	Specific recommendation	IBPGWG decision
<b>Amend definition</b>	Include sports drinks and vitamin waters  Rationale: The George Institute does not agree that sports drinks and vitamin waters are suitable under the exclusion list, stating that Sports drinks and vitamin waters contribute limited valuable nutrients to consumer diets, and both often contain large quantities of added sugars.	Excluded. Pre-packaged beverages in cans and bottles are excluded from the serving size recommendation.
	Separate milk-based and water-based chilled sweet beverages.  Rationale: Dietitians Australia maintain that sweetened beverages with substantive additions (e.g. milk-based fruit smoothies) have a significantly different nutrient profile than water-based sweetened beverages (e.g. 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.	Do not separate.  It is impractical from an implementation perspective to set different serving sizes based on kilojoules, sugar or other nutrient content.  In addition, the recommended maximum serving size of 450 mL is a generous serving. The IBPGWG recommends the serving sizes in the Guide are reviewed regularly.
	Include beverages designed for retail that are sold in the out of home sector i.e. chilled beverages sold in cans and bottles.  Rationale: Western Australia Department of Health note that according to the rationale for the Industry Best Practice Guide (IBPG), there has been a shift away from post mix drinks sold (in cups) in the out of home sector, to those sold in bottles and cans. Therefore, serving sizes for the out of home sector	While pre-packaged beverages in cans and bottles are excluded from the serving size recommendation, guidance on the pairing of these products with meal sizes will be included in the Best Practice Guide. The IBPGWG recommend that the following conversion be adopted, depending on meal size ordered: 200-250 ml can = small size; 375 ml can/300 ml bottle = medium size; 390-450 ml bottle/440 ml can = large size.

Type of recommendation	Specific recommendation	IBPGWG decision
	<p>should also be recommended for beverages sold in bottles and cans.</p>	
	<p>Do not include non-nutritive sweetened beverages.</p> <p>Rationale: Beverages sweetened with sugar alternatives contain very low levels of energy (kilojoules), often well below 5 kJ per 100 ml and have zero sugar. These are not beverages that are high in sugars nor are they energy dense. These types of drinks can play a significant role in the diet as they help support consumers who may wish to reduce sugar intake. They provide choice for consumers, have very similar nutrient profile to water, and carry a Health Star Rating of 3.5 stars. These beverages do not contribute to discretionary energy intake and therefore should not be included in this category.</p>	<p>All chilled beverages are included for consistency and ease of implementation. It is impractical from an implementation perspective to set different serving sizes based on kilojoules, sugar or other nutrient content.</p>
	<p>Do not include frozen beverages or beverages containing ice.</p> <p>Rationale: The appearance of frozen beverages is deceptive, given the normal cup size at around 590 ml contains only 295 ml of liquid, the other half being gas such as carbon dioxide. Many other similar beverages purchased in the out of home scenario via cup also contain ice which takes up a lot of space within the cup, therefore the cup size does not necessarily dictate or reflect the volume of beverage it contains.</p>	<p>It is impractical from an implementation perspective to set different serving sizes based on ice content. In addition, customers can request drinks without ice. It should also be noted that the 450 mL serving size is the maximum recommended serving size, not a target.</p>
	<p>Do not include fruit and vegetable juices or flavoured milk.</p> <p>Rationale: The ABCL states the rationale to include all chilled beverages, sweetened or unsweetened, whether they are a core food or discretionary food, is confusing for consumers and does not align with the original intent of the best practice guide, i.e., to reduce discretionary energy intake.</p>	<p>All chilled beverages are included for consistency and ease of implementation. It is impractical from an implementation perspective to set different serving sizes based on kilojoules, sugar or other nutrient content. In addition, the maximum recommended serving size of 450 mL exceeds the Australian Dietary Guidelines serve recommendation of 125 mL/day for juices.</p>
	<p>Include sweetened iced coffee and ready-to-drink coffee beverages</p>	<p>Iced coffee has been added to the list of inclusions. RTD products</p>

Type of recommendation	Specific recommendation	IBPGWG decision
	Rationale: These products can contain 7-8% sugar in which case there could be a reasonable amount of sugar in a 300-500 ml bottle. It would make sense to group these with 'iced teas'.	intended for retail sale are excluded from the serving size recommendation.
<b>Clarify definition</b>	Suggest the following amendment:  Proposed: May be sold as single serves (e.g. a cup) or in large bottles or jugs to share/ for multiple servings. Amended: May be sold as single serves (e.g. a cup) or in multiple servings (e.g. bottles, jugs) <i>for onsite consumption</i> .	The definition has been amended.
<b>Other recommendations</b>	Plan for further reductions to reach a recommended serving size of no greater than 375 ml (typically ~600 kJ for soft drinks) within the next 6 years.	The IBPGWG recommends the serving sizes in the Guide are reviewed regularly.
	Develop guidance for hot beverages.  Rationale: Hot sweetened beverages such as hot chocolate, matcha lattes, chai lattes, seasonal spiced beverages (e.g. 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.	Hot beverages will not be included in the chilled beverages category, as they did not form part of the original scope or data analysis. The IBPGWG agree this category warrants further investigation to halt serving size creep and recommend that this is considered in future reviews of the Guide.

### Support for proposed changes

Dietitians Australia, the Western Australia Department of Health, The George Institute and one industry respondent are generally supportive of the amendments as proposed, suggesting only minor changes to the definition.

Dietitians Australia support the decision to apply the serving size targets to beverages with or without ice, noting 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.

WA Health support the decision to apply the maximum serving size recommendation to all beverages high in added sugar, intrinsic sugar or sweetened with intense sweetener.

The George Institute agrees with all proposed amendments, particularly the addition of fruit and vegetable juices to this category given they are often consumed in excess of recommendations outlined in the Australian Dietary Guidelines.

### Opposition to proposed changes

The AFGC, the NZFGC and the ABCL did not agree with the proposed changes. These respondents disagree with the inclusion of non-nutritive sweetened beverages, and frozen beverages / beverages containing ice. The ABCL also disagrees with the inclusion of fruit and vegetable juices and flavoured milk.

The AFGC highlighted that the appearance of frozen beverages is deceptive, given the normal cup size at around 590 ml contains only 295 ml of liquid, the other half being gas such as carbon dioxide. The AFGC sought clarification that the serving size is based on the beverage quantity not the container/cup in which the beverage is served. In the example above, the beverage volume meets the serving size recommendation of 450 ml but the cup volume of approximately 600 ml exceeds the serving size.

The AFGC and the NZFGC recommend aligning the maximum recommended serving size with the industry agreed guidance used in the retail packaged drinks sector of 600 ml.

## Appendix C – Respondents who consented to the publication of their submissions

Australian Food and Grocery Council  
Australian Association of Convenience Stores  
Australian Beverages Council Limited  
Australian Industry Group  
Cancer Council Australia  
Chronic Disease Prevention Directorate,  
Western Australia Department of Health  
Dietitians Australia  
Food and Beverage Importers Association  
Global Obesity Centre, Deakin University  
Heart Foundation  
KFC Australia  
Laureate Professor Clare E Collins  
Mondelez International  
National Retail Association  
Nestle  
New Zealand Food & Grocery Council  
New Zealand Ministry of Primary Industries  
Obesity Policy Coalition  
Prevention Division, Queensland Department of  
Health  
Public Health Association of Australia  
Restaurant and Catering Industry Association  
Sarah Johnson  
The George Institute for Global Health  
Unilever ANZ  
Woolworths Group