

AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

APPLICATION A1090:
VOLUNTARY ADDITION OF VITAMIN D TO
BREAKFAST CEREAL

Sustaining Australia

SUMMARY

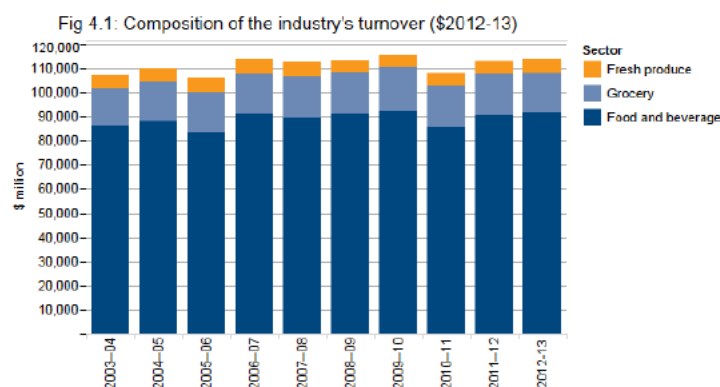
The Australian Food and Grocery Council (AFGC) –

- ❖ recognises that there exists evidence of less-than-optimal vitamin D levels in the Australian community*
- ❖ recognises that traditional food sources of vitamin D (primarily dairy foods) are under challenge through pressure to develop low-fat varieties (noting vitamin D is fat-soluble)*
- ❖ is conscious that developed overseas jurisdictions permit vitamin D fortification of breakfast cereals*
- ❖ recognises the need for appropriate dietary modelling to ensure vitamin D consumption would remain within acceptable limits should the application be approved and*
- ❖ to this extent supports the Application.*

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 178 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.



Source: Based on ABS, catalogue number 8221.0, 8159.0 and 8155.0
 Note: As outlined in chapter 3 of the State of the Industry 2014 report, caution should be applied when comparing data before and after the 2006 ANZSIC code changes.

With an annual turnover in the 2013-14 financial year of \$114 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector is Australia's largest manufacturing industry. Representing 27.5 per cent of total manufacturing turnover, the sector accounts for over one quarter of the total manufacturing industry in Australia.

The diverse and sustainable industry is made up of over 27,469 businesses and accounts for over \$55.9 billion of the nation's international trade in 2013-14. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry spends \$541.8 million in 2011-12 on research and development.

The food and grocery manufacturing sector employs more than 299,731 Australians, representing about 3 per cent of all employed people in Australia, paying around \$12.1 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

COMMENTS

The Australian Food and Grocery Council (AFGC) –

- ❖ recognises that there exists evidence of less-than-optimal vitamin D levels in the Australian community
 - Information from the 2011-12 Australian Health Survey¹ indicates that 23% of the adult Australian population, or about 4 million adults, had suboptimal vitamin D serum levels, made up of 17% with a mild deficiency, 6% with a moderate deficiency and less than 1% with a severe deficiency.
 - Overall rates of suboptimal vitamin D serum levels were very similar for both men and women.
 - One in twenty Australian adults (5%) were taking Vitamin D supplements in 2011–12.
 - The majority (74.8%) of Australian adults had sufficient levels (>50 nmol/L) of Vitamin D in 2011–12.
 - Among those with relatively high Vitamin D levels (greater than or equal to 100 nmol/L), only around one in ten were taking Vitamin D supplements.
 - Children had relatively low levels of Vitamin D deficiency in 2011–12.

Vitamin D levels were measured via a blood test and so includes both food and sunlight derived vitamin.

- ❖ recognises that traditional food sources of vitamin D (primarily dairy foods) are under challenge through pressure to consume lower-fat varieties (noting vitamin D is fat-soluble)

The 2013 *Australian Dietary Guidelines Summary* (NHMRC) states “Include milk, yoghurt and cheese and/or alternatives— **mostly reduced fat**” (emphasis added).

¹ <http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4364.0.55.006Chapter2002011-12>

The Summary further states “Milk, yoghurt and cheese are rich sources of calcium and other minerals, protein, and vitamins, including B12”.

....

“However, choosing mostly full fat varieties can increase the saturated fat and energy (kilojoule) content in the diet. A wide range of milk products of varying fat levels are now available in Australia. ...”

That said, the bioavailability of vitamin D through dairy products is high and may reflect as yet unidentified synergies with other components in dairy foods. For this reason, the current vitamin D fortification provisions in dairy foods (currently 10% of the “rRDI”) should be considered for parity with any non-dairy food fortification changes.

- ❖ is conscious that developed overseas jurisdictions permit vitamin D fortification of breakfast cereals

The Application includes references to jurisdictions internationally that permit vitamin D fortification of breakfast cereals. The AFGC supports the principle of aligning Australian standards with those prevailing internationally unless some demonstrable significant risk to safety is identified.

- ❖ recognises the need for appropriate dietary modelling to ensure vitamin D consumption would remain within acceptable limits should the application be approved

FSANZ should note that the level of 10ug cholecalciferol established in the Schedule to Standard 1.1.1 is not a recommended dietary intake, but rather the recommended daily oral intake as a supplement for those Australians not exposed to sunlight. Because of the major role of sunlight in determining vitamin D status, a RDI for vitamin D has not been developed for the Australian population. References to the application seeking fortification at 25% “rRDI” might be confusing and should be avoided.

- ❖ to this extent supports the Application.

If dietary modelling indicates that vitamin D fortification of breakfast cereal at 2.5ug cholecalciferol equivalence per serve is within

acceptable safety limits, the AFGC considers that manufacturers should be free to formulate products accordingly as one measure to accommodate the suboptimal serum vitamin D levels identified in the 2011-12 dietary survey.

Dietary modelling and consideration should also be given, as stated above, to parity fortification in dairy products.

For full disclosure, a company related to the Application (DSM Specialty Foods) is a member of the AFGC.

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