



# **A1090 Voluntary Addition of Vitamin D to Breakfast Cereal**

## **FINAL STATEMENT**

**August 2016**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on the proposal A1090 Voluntary Addition of Vitamin D to Breakfast Cereal by Food Standards Australia New Zealand.

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## **DAA interest in this consultation**

DAA is the peak professional body for dietitians in Australia and responsible for the Accredited Practising Dietitian (APD) program as the basis for self-regulation of the profession.

DAA advocates for a safe and nutritious food supply in which the community has confidence and which meets the nutritional needs of all Australians, including groups with special needs.

As experts in nutrition, Accredited Practising Dietitians (APDs) assist the general population and groups with special dietary needs to meet their nutritional needs. APDs also assist with the translation of food labels and nutrition content claims.

## **Statement**

Firstly, DAA acknowledges and credits the involvement of the Australia and New Zealand Ministerial Forum on Food Regulation in this application process. DAA are supportive of their steps to protect public health interests.

DAA wishes to submit a draft statement in relation to the Food Standards Australia New Zealand (FSANZ) Review Consultation Paper of 8 July 2016, “Voluntary Addition of Vitamin D to Breakfast Cereal”.

DAA has had difficulty reaching a consensus. The areas which have concerned DAA are:

### **1. Consistency of permission of fortification of foods**

Breakfast cereals currently are permitted to be fortified with a number of vitamins and minerals without nutrient profiling being applied. DAA believes that there will be the potential for inconsistency within the Code if nutrient profiling is applied to determine the suitability of one new vitamin fortificant when this does not apply to others.

### **2. Suitability of the Nutrient Profiling Scoring Criterion (NPSC)**

The NPSC was adapted from the UK for use in Australia for the purpose of determining foods that provided adequate nutrients to be able to make health claims – based on their nutritional profile for energy, sugars, saturated fat, sodium balanced against protein, fibre and fruit, nut, legume and vegetable content – not for deciding whether foods are suitable vehicles for fortification.

### **3. The benefits of applying the Nutrient Profiling Scoring Criterion (NPSC)**

The Australia Dietary Guidelines recommend grain foods be included in the diet every day and this includes breakfast cereals. Yet, breakfast cereals vary significantly in their nutritional profile. There is a concern that allowing Vitamin D fortification in all breakfast cereals could inadvertently

provide a new marketing opportunity for ‘discretionary’ breakfast cereals. With significant public interest in Vitamin D, allowing fortification and associated nutrient claims on the front of pack could unintentionally make the cereal appear healthier than it is.

Conversely, restricting fortification of Vitamin D to higher nutrient dense cereals, through the use of a NPSC, may in turn, increase the cost of these cereals. Restricting this increased cost only to ‘healthier’ cereals could impact those in low-socioeconomic groups who cannot afford to purchase higher priced cereals and therefore has the potential to increase the health gap further for low income groups, for example if discretionary cereals became universally cheaper.