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**SUBMISSION ON REVIEW CONSULTATION PAPER - APPLICATION A1090:
Voluntary addition of vitamin D to breakfast cereals**

The Department of Health Western Australia (DOH) would like to thank Food Standards Australia New Zealand (FSANZ) for seeking comment on the review consultation paper - Application A1090: Voluntary addition of vitamin D to breakfast cereals.

This submission has been prepared by the DOH, Environmental Health Directorate. Comments in response to the consultation paper are detailed below.

Question 1: The basis of voluntary vitamin D addition to breakfast cereal was public health need. In your view, is public health and safety protected by applying the nutrient profiling scoring criterion (NPSC) to permission to fortify ready-to-eat breakfast cereal with vitamin D?

- Vitamin D is a complex conditionally essential fat soluble nutrient, with multiple actions in the body.
"Vitamin D is a potent steroid hormone that may have important physiological actions outside mineral homeostasis, including the regulation of cell differentiation and proliferation and immune function."^{(1)p269}
- The DOH promotes adequate safe sun exposure for the prevention of vitamin D deficiency, given the main source of vitamin D is photochemical synthesis in the skin; a source that is free and does not place a cost burden on consumers.
- There continues to be debate on the threshold levels for deficiency; and a lack of evidence of the relationship between 25OHD to the active metabolite (1,25 dihydroxy calciferol) and to proven vitamin D deficiency states.^(2, 3)
- Whilst FSANZ dietary modelling predicted that the proportion of Australians with serum 25OHD <40 nM would reduce from 13.4% to 1.6%, conversely, the proportion of Australians with serum 25OHD >125 nM would increase from 1.3% to 7.5 %. The Institute of Medicine concluded that serum 25OHD levels above 125 to 150 nM should be avoided, and that a cautious approach to an Upper Level based on current emerging evidence is justified.⁽⁴⁾

- Given the burden of disease attributable to over-nutrition, the health halo effect of nutrition and health claims, may mislead consumers and promote excessive portion sizing and other consumer behaviours which requires consideration.⁽⁵⁻⁹⁾
- The Ministers of the Forum on Food Regulation have clearly articulated that they do not support the voluntary fortification of foods that are high in salt, sugar, and saturated fat or foods that have no nutritional value. In this case, such a voluntary fortification may also set a precedent for the fortification other high sugar foods.
- The Australia New Zealand Food Standards Code (the Code) has already set a precedent for the use of compositional criteria for the voluntary fortification of biscuits.
- Although more restrictive criteria than that of the NPSC would be more suitable, using the NPSC as the compositional criteria does provide a method to apply the principles of the Ministerial Policy Guideline on the Fortification of Food with Vitamins and Minerals; and the NPSC is a tool that is already embedded the Code.

Question 3: How (if at all) would these impacts differ if the permission were to be restricted to breakfast cereal that meets the NPSC?

The DOH notes that there is minimal impact on industry in applying the NPSC as this approach only excludes a small number of breakfast cereal products.

Question 4: What evidence do you have on the effects of added vitamins and minerals on consumers' perceptions of or choice of breakfast cereal product?

Evidence on the effects of added nutrients and claims on consumers' perceptions of choice of breakfast cereal product and other food products includes research by Faulkner et al. 2014; Harris et al. 2011; Sütterlin and Siegrist 2015 (refer to the reference list below).

In summation, the DOH **supports** the option of applying the NPSC to permission to fortify ready-to-eat breakfast cereal with vitamin D, as described in the review consultation paper – Application A1090.

Yours sincerely

**MANAGER
FOOD UNIT
ENVIRONMENTAL HEALTH DIRECTORATE**

References:

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