



August 2016

Project Officer Application A1090
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1090

Dear Sir/Madam

**Proposal A1090 – Voluntary Addition of Vitamin D to Breakfast Cereals Review Consultation Paper –
Call for Submissions**

Thank you for the opportunity to comment on the Review paper for this proposal. The Ministry for Primary Industries (MPI) has the following comments to make.

General comments:

MPI fully supports the fortification of breakfast cereals with vitamin D, whether this is only available in a restricted selection of cereals that meet nutrition profiling scoring criterion (NPSC) or whether it is available in all cereals. This is because MPI acknowledges the potential beneficial public health impact of receiving adequate levels of dietary vitamin D. We consider that FSANZ has selected the appropriate tool (the NPSC) in response to the clarification statement provided by the Forum.

Applying the NPSC, as outlined by FSANZ in the Review Paper, is consistent with the intent of not encouraging the consumption of unhealthy foods by allowing them to be fortified. Therefore in principle MPI supports the approach outlined by FSANZ in this review consultation paper, as FSANZ has responded to the Forum clarification statement and provided a suggested draft variation that could implement the Forum's request.

We do however, accept this with some hesitancy in regards to making an exception by imposing nutrient profiling criteria for one nutrient, when other nutrients can already be added without nutrient profiling criteria, and when breakfast cereals as a food category are considered a core food. We also accept the application of the NPSC to this proposal with some hesitancy in regards to the lack of definitive data showing that addition of vitamin D to any breakfast cereals is a major purchasing driver for less healthy breakfast cereals. Even if vitamin D content were a major driver for people to purchase breakfast cereals, there are other mechanisms available (eg Health Star Rating which has had the highest uptake amongst the breakfast cereals category in both Australia and New Zealand, which would allow people to assess which of the vitamin D fortified breakfast cereals are more or less healthy.

MPI's preference is therefore to allow the vitamin D fortification of all breakfast cereals, without the NPSC applied. However, in order to achieve vitamin D fortification of this category of product, we accept the approach as outlined in the Review Report, ie to apply to NSPC. As this will result in an analogous situation for the other permitted vitamins and minerals, consideration of an equitable approach may be required in due course.

If the approach as outlined in the Review Report, ie to apply the NPSC, is to be the final recommendation MPI suggests that consideration should be given to a draft variation that requires the same relevant additional labelling requirements to be met as outlined in Division 7 of Standard 1.2.7. This will assist enforcement agencies to determine if a given breakfast cereal meets the NPSC as all relevant details will be provided on the label.

Comments in relation to questions in Call for Submissions:

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 NPSC to permission to fortify ready-to-eat breakfast cereal with vitamin D? Please provide evidence for your view.

MPI agrees with the FSANZ assessment, that "permitting the voluntary addition of vitamin D only to breakfast cereal that meets the NPSC in line with the intent of the Policy Guideline will have minimal impact on the expected improvements in the population vitamin D status." This is due to the relatively small consumption rates of less nutrient dense breakfast cereals in comparison with more nutrient dense breakfast cereals. MPI notes however, that because the less nutrient dense cereals tend to be consumed by children aged two to eight years of age, this age group may indeed benefit from vitamin D fortification more than older children or young adults. It is difficult to assess from the supporting document how application of the NPSC criteria would impact the proportion of the population in Australia with inadequate intakes of vitamin D, and if this would be equitable population groups.

Without definitive data regarding the main drivers for consumers purchasing breakfast cereals, it is not possible to say whether allowing the addition of vitamin D to breakfast cereals with a less healthy nutrient profile would further encourage purchase of those products. Even if this were to result in vitamin D nutrient content claims on less healthy breakfast cereals, FSANZ indicates that consumer research shows that "the presence of a claim does not alter consumer's perceptions of the nutritional value or healthiness of a product when they have access to standard on-pack nutritional information such as the statement of ingredients and the nutrition information panel".

As all other specific questions were addressed to industry, MPI has no further comments.

Yours sincerely


Manager Food Science and Risk Assessment