

Submission to: **Food Standards Australia & New Zealand**

In response to:

A1090 – Review Consultation Paper

Voluntary Addition of Vitamin D to Breakfast Cereal

Scientist Corporate Regulatory

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*"Sharing health and hope
for a better life"*

Introduction

Preamble

Sanitarium Health and Wellbeing began in 1898 with the vision to help people 'learn to stay well'. Our mission is to **'inspire and resource our community to experience happy, healthy lives'**. We have been committed to this philosophy for over 100 years and it is the reason we exist today. Sanitarium also believes that good business is based on trust, respect and community involvement.

Sanitarium has a strong history of educating the community about healthy eating and healthy lifestyles. All of Sanitarium's activities have twin goals in mind - to provide healthy foods that actively improve our community's health and well-being, and to offer easy-to-understand nutrition information and practical health advice.

Sanitarium Australia and Sanitarium New Zealand are owned and operated by Australian Health & Nutrition Association Limited and New Zealand Health Association respectively. We produce over 150 products and employ approximately 1700 people in our manufacturing and distribution sites throughout Australia and New Zealand.

Sanitarium welcomes the opportunity to comment on the development and evolution of the Australia & New Zealand Food Standards Code. We believe we can provide a unique perspective and give valuable suggestions into the food policy and standards development in Australia and New Zealand.

Information contained in this submission has been drawn from the experiences of Sanitarium, and contains no commercial-in-confidence material – unless otherwise highlighted.

Discussion

Sanitarium appreciates the opportunity to make this submission to FSANZ in response to the call for submissions on the review consultation paper for A1090 Voluntary Addition of Vitamin D to Breakfast Cereal.

- 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.**

Sanitarium does not believe it is necessary to apply a nutrient profiling tool to determine which breakfast cereals may be fortified with vitamin D. This is because breakfast cereals make a valuable contribution to daily nutrient intakes, without contributing excessive amounts of sugar, salt and fat. In fact, based on the Australian Health Survey, research commissioned by the Australian Breakfast Cereal Manufacturers Association, found that adults who consume breakfast cereal had 12% lower daily sodium intakes compared to adults who did not consume breakfast cereal, yet had higher intakes of a variety of vitamins, mineral and fibre. While sugar intake was higher in breakfast cereal consumers, this was total sugars, including sugars found naturally in milk and fruit¹. Interestingly, there was no

¹ <http://www.cereal4brekkie.org.au/new-data-bowls-sugar-spin/>

difference in daily energy intake between consumers of pre sweetened cereals and lower sugar cereal consumers.

Because the NPSC will restrict the number of breakfast cereals actually making general or high level health claims about vitamin D, the uptake of vitamin D fortification may be limited anyway.

However, if the decision is made to apply a nutrient profiling tool to determine whether a breakfast cereal may have vitamin D added, then we agree that currently the NPSC is the most logical tool to use.

2) What are the positive and negative impacts on the breakfast cereal industry of permitting vitamin D in all breakfast cereal?

The positive impacts are that industry has the opportunity to fortify a wide range of cereals that meet the needs of people of different ages and socio economic backgrounds, hence providing a wider range of vitamin D fortified cereals.

We do not see any negative impacts.

3) How (if at all) would these impacts differ if the permission were to be restricted to breakfast cereal that meets the NPSC? Please provide data or evidence to support your response.

If the NPSC was applied, fewer cereals could be fortified with vitamin D. Not all breakfast cereals that fail the NPSC are those that are high in sugar or targeted to children. Corn Flakes and Puffed Rice cereals for example, do not meet the NPSC, yet are affordable, low cost family cereals, that under this scenario would not be eligible to carry vitamin D.

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

We are not able to provide any information.

5) What, if any, is the difference in consumer's response to the presence or absence of vitamin D in food compared to their response to the presence or absence of other vitamins? Please provide the evidence used to inform your response.

We are not able to provide any information.