

Submission to:
Food Standards Australia New Zealand

In response to:

**APPLICATION A1090 VOLUNTARY ADDITION OF
VITAMIN D TO BREAKFAST CEREAL**

[REDACTED]
Scientist Corporate Regulatory

Food Environment & Science
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*"Sharing health and hope
for a better life"*

Executive Summary

Sanitarium recognises that the vitamin D status of the population in Australia (and globally) is below ideal levels. As a manufacturer of health foods and educator of the community on healthy eating, Sanitarium is supportive of measures to increase the vitamin D content of the food supply.

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 recognises that vitamin D deficiency is a serious public health issue in Australia (and globally), with ~30% of adults deficient. This level increases to >50% in women in the winter months. In Australia most adults are unlikely to obtain more than 5-15% of their vitamin D requirements from dietary sources. The average intake in Australia is 80-120IU (2-3µg/day). The average intake in the US is 120-240IU due to more extensive fortification. The recent Australian Health Survey confirms the concern regarding vitamin D deficiency in Australia, particularly amongst some minority groups.

It is important to remember that our main source of vitamin D is from safe sun exposure. Obtaining sufficient vitamin D from natural food sources alone is difficult. Consuming fortified foods and having some sun exposure are essential. In some groups dietary supplements may be required.

If we have more vitamin D in the food supply (at safe levels like other countries) it won't ensure most meet RDA/RDI, but it could increase intakes >2.5µg/day and could reduce the number of people with deficiency and reduce cases of rickets. It would also raise the population mean, with more falling into the vitamin D adequate range during winter.

Fortification with vitamin D at the low levels recommended poses minimal risk to the population, but will likely contribute towards reducing deficiency rates. Studies show that vitamin D fortification of a variety of foods contributes to the provision of adequate vitamin D within the food supply.

Breakfast cereals are a suitable option for fortification, based on experience in other countries, and given the frequency of consumption, fortified breakfast cereals have the potential to improve Australia's vitamin D status.

At fortification doses, vitamin D2 appears to be equally effective as D3 in prevention of vitamin D deficiency and protecting vitamin D status.

There is a case for more vitamin D in the food supply because adequate safe sunlight exposure is difficult to achieve for many Australians; vitamin D is safe, and can easily be incorporated into a range of foods; vitamin D has a long history of being safe and effective in other countries.

Conclusions & Recommendations

Sanitarium supports the application to amend Standard 1.3.2 – Vitamins and Minerals in the Australia New Zealand Food Standards Code to permit the voluntary fortification of breakfast cereal with vitamin D (permitted forms of D2 and D3) to a maximum claim of 2.5µg per normal serving. The maximum claim corresponds to 25% regulatory Recommended Dietary Intake (rRDI) of 10µg/day.