



24 January, 2017

Re: Application A1134 – Increased Concentration of Plant Sterols in Breakfast Cereals

Lion Dairy & Drinks (Lion) appreciates the opportunity to make a submission for consideration on the *Application A1134 – Increased Concentration of Plant Sterols in Breakfast Cereals* (referred to throughout the document as *A1134*).

The core activities of Lion's Dairy & Drinks business in Australia are the manufacture and wholesale of white milk, flavoured milks, fresh dairy foods, and specialty cheeses and fruit juices. Lion's Dairy & Drinks business was formerly known as National Foods, and has dairy origins stretching back to the formation of the Dairy Farmers' Milk Cooperative in 1900.

Lion commends Food Standards Australian New Zealand (FSANZ) for aiming to improve public health through increasing fortification of plant sterols in permitted foods, as nominated in *A1134*.

However, we recommend FSANZ raises a 'proposal' to address plant sterol fortification for all current permissions, including milk and yoghurt – and not just breakfast cereals, aiming for consistent levels in the food choices available to consumers of 0.5- 2.2g/ serve.

Lion's rationale:

Lion supports consistency in the regulation of plant sterol fortification to achieve a public health benefit, but note the current discrepancies in the amounts of plant sterol fortification permitted in breakfast cereals, milk and yoghurt versus margarine and cheese. Lion is concerned *A1134* will create greater inconsistency, with plant sterol fortified breakfast cereals (along with margarine and cheese) able to provide approximately 2g of plant sterols per serve, but plant sterol fortified milk and yoghurt only *half* of this level. See table 1 for details.

Table 1: Proposed versus Current permitted plant sterol fortification in foods

Food	Per litre or kilogram	Per serve
<i>Proposed</i> breakfast cereal	-	0.5- 2.2g / serve
<i>Current</i> breakfast cereal	15-19g/kg	0.45-0.57/30g
<i>Current</i> margarine	82g/kg	2.05g /25g
<i>Current</i> cheese	70-90g/kg	1.75- 2.25g /25g
<i>Current</i> milk	3-4g/L	0.75-1g/250mL
<i>Current</i> yoghurt	-	0.8-1g/pack

Lion believes increased plant sterol fortification permissions for all food groups will provide consumers with a range of convenient food options for helping to manage their cholesterol levels. Such increased permissions are unlikely to pose a risk to public health and safety, as the scientific evidence shows the consumption of 5.4-6 g per day of plant sterols is safe (page 7 of *A1134*). NB: current intake is 0.15-0.35g plant sterols daily¹.

¹ FSANZ. Plant Sterols. <http://www.foodstandards.gov.au/consumer/nutrition/plantsterol/Pages/default.aspx>

T +61 3 9188 8000
F +61 3 9188 8001
W www.lionco.com

Lion
737 Bourke Street
Docklands
VIC 3008
Australia

PO Box 23084
Docklands
VIC 8012
Australia

Lion – Dairy & Drinks
Pty Limited
ABN 65 004 486 631

FSANZ justifies milk and yoghurt having lower permitted plant sterol fortification because “such foods are routinely consumed through more than one serving a day” (page 9 of A1134). However, the Australian Health Survey shows consumers are having an average of approximately half a serve of milk (148mL) and one tenth of a serve of yoghurt (24g) per day.²

The Australian Dietary Guidelines recommend approximately three serves of dairy per day.³ Lion is concerned that A1134 could result in consumers increasing their plant sterol intake from breakfast cereals or margarine, rather than core dairy, such as milk and yoghurt – when less Australians are meeting their recommended serves of dairy compared with breakfast cereals. For example, dairy consumption in Australia is already low, with the 2011-2012 Australian Health Survey showing:

- 90% of the Australians aged two years and over failed to meet the recommended serves for dairy – with only 0.1% of women aged 51 years and over, and 0.5% of girls aged 14-18 years old meeting the daily dairy recommendations⁴; and
- Nearly three quarters of females (73%) and half of all males (51%) aged two years and over did not meet their calcium requirements – with nine out of 10 females aged 12-18 years and 51 years and over not meeting their calcium requirements².

In comparison, almost one in three (30%) Australians aged two years and above met the recommended guidelines for grain or cereal foods and the Australian Dietary Guidelines recommend consumers use margarine in ‘small amounts’.^{3,4}

Lion’s recommendation:

- FSANZ develop a ‘proposal’ to increase plant sterol fortification for all current permissions, including milk and yoghurt – to allow ‘efficacious amounts per serving’.
 - This is 0.5- 2.2g/ serve (same as for breakfast cereals), considering the current criteria for total fat (1.5g/100g).
- This will provide consumers with a range of convenient foods options for helping to manage their cholesterol.

We welcome the opportunity to discuss our feedback with you, and look forward to working together in the future.

Regards



Group Nutritionist



² 4364.0.55.008 - Australian Health Survey: Usual Nutrient Intakes, 2011-12, March 2015.

<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/4364.0.55.008~2011-12~Main%20Features~Calcium~401>

³ Australian Dietary Guidelines: <https://www.eatforhealth.gov.au/food-essentials/fat-salt-sugars-and-alcohol/fat>

⁴ 4364.0.55.012 - Australian Health Survey: Consumption of Food Groups from the Australian Dietary Guidelines, 2011-12, May 2016.
<http://www.abs.gov.au/ausstats/abs@.nsf/mediareleasesbyCatalogue/E091CDB463A4CBBACA257FAF001A3CEC?OpenDocument>