

Dear FSANZ

Thank you for the opportunity to provide a submission in relation to A1090 – Voluntary Addition of Vitamin D to Breakfast Cereal. This application needs to be considered in the context of the complete assessment process undertaken by Food Standards Australia New Zealand (FSANZ). Throughout its assessment process, FSANZ has tacitly accepted the framing of this application as being motivated by public health objectives. This framing is incorrect. Instead, the application is consistent with characteristics indicative of it being motivated primarily to support marketing opportunities for certain food manufacturers. If the application was genuinely motivated by public health concerns, it would seek to mandate vitamin D fortification rather than leave the implementation of the intervention to the discretion of a food manufacturer. Conversely, evidence exists that voluntary fortification is used by a number of food manufacturers to support marketing activities, often for products that are discretionary foods and inconsistent with Dietary Guideline recommendations (Lawrence, M. (2013). Food fortification: The evidence, ethics, and politics of adding nutrients to food, Oxford University Press).

The latest national nutrition survey shows that energy dense, nutrient poor 'discretionary foods' contribute, on average, 35% of total daily energy intake. The latest national nutrition survey shows that energy dense, nutrient poor 'discretionary foods' contribute, on average, 35% of total daily energy intake.

Many public health nutritionists believe that the food fortification and the nutrition and health claims food standards are contributing to these dietary imbalances because the standards are being exploited for the benefit of producing and marketing discretionary foods.

In its assessment of this application FSANZ has needed to do more to use its authority to promote a healthy and sustainable food environment and to help protect public health against diet-related non-communicable diseases. It is not sufficient for FSANZ to base its risk assessment on limited data collected from surveys undertaken 5 and 6 years ago. In relation to the use of the nutrient scoring system in the context of breakfast cereals to assess risk, FSANZ has overlooked public health risks associated with dietary imbalances as reflected in dietary guideline recommendations and instead limited its analysis to a reductionist paradigm informed by nutrient scoring. Nutrient profiling is an insufficient basis to adequately assess public health risk in food regulation.

I recommend that the application not be approved.

Sincerely

Mark Lawrence

Mark Lawrence PhD, RPHNutr, APD  
Professor (Public Health Nutrition)  
Institute for Physical Activity and Nutrition  
School of Exercise and Nutrition Sciences, Faculty of Health



Deakin University

Melbourne Burwood Campus,

Website: <http://www.deakin.edu.au>

Adjunct Professor, Curtin University  
Honorary Fellow, Centre for Food Policy, City University London