Submission – Application A1090 Voluntary addition of Vitamin D to Breakfast Cereal

Comments from the Department of Health and Human Services, Tasmania,
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The Department of Health and Human Services, Tasmania (the Department) appreciates the opportunity to comment on Application 1090 – Voluntary Addition of Vitamin D to Breakfast Cereals.

Fortification of food has the potential to address vitamin D deficiency if the population group affected consume this fortified food. Whilst vitamin D deficiency is higher in some regions around Australia than others and is more common in indigenous groups and migrant groups it is still a population wide issue with over 20% of the Australian population having serum 25OHD serum concentrations less than 40nM. Therefore the fortified food needs to be consumed by a large proportion of the population to address the deficit.

The Department notes that the proportion of the population eating RTE breakfast cereals from the 2011-12 National Nutrition and Physical Activity Survey (NNPAS) was only 35% and appears to be a decrease from the 1995 Australian National Nutrition Survey (ANNS) of 41%. The Department questions whether this is an appropriate vehicle for food fortification due to the small and potential decreasing proportion of the population consuming RTE breakfast cereals. It is also unknown if the 35% consuming RTE breakfast cereals are the same group that are vitamin D deficient.

As outlined in the *Policy Guideline - Fortification of Food with Vitamins and Minerals* in order for a food to be fortified it must meet a number of specific order principles. The Department feels there is insufficient evidence to meet the second principle as stated:

- *The permitted fortification has the potential to address the deficit or deliver the benefit to a population group that consumes the fortified food according to its reasonable intended use.*

The Department would like FSANZ to consider further data analysis on the Australian Health Survey to answer the question - what is the vitamin D status of those who consume RTE breakfast cereals? This will enable further clarity on whether the addition of vitamin D to RTE breakfast cereals has the potential to improve vitamin D deficiency in population groups with subclinical evidence of deficiency. With only 35% of the population consuming breakfast cereal it is important to determine if this strategy will meet its intended audience.

The Department also considers the addition of vitamin D to all RTE breakfast cereals is not in line with the third and fourth specific order principles of the *Policy Guideline - Fortification of Food with Vitamins and Mineral* as stated below:

- *Permission to fortify should not promote consumption patterns inconsistent with the nutrition polices and guidelines of Australia and New Zealand*

- *Permission to fortify should not promote increased consumption of foods high in salt, sugar or fat, or foods with little nutritional value that have no other demonstrated health benefit*

The addition of vitamin D to all RTE breakfast cereals may mislead consumers on the healthiness of some products that are higher in sugar, salt or fat. These RTE cereals are also inconsistent with the Australian Dietary Guidelines.

Should this application proceed, the Department requests that consideration of the addition of vitamin D only be permitted to cereals that meet the nutrient profiling score (NPSC) as outlined in Standard 1.2.7. This prevents the advertising of unhealthy RTE breakfast cereals as a source of vitamin D.

The Department does not agree that the current strategies that exist within the Code ensure consumers are not misled with respect to the nutritional quality of the food if vitamin D was added to all RTE breakfast cereals. Cereals higher in sugar, salt or fat would still be able to make a content claim which may persuade some consumers to purchase these products, particularly as consumers are aware of the importance vitamin D.

Whilst the Department acknowledges that a range of vitamins and mineral can already be added to all breakfast cereals, the decision to allow fortification with these vitamins and minerals preceded the policy guideline. The Department would like to see future vitamins and minerals added to foods that are consistent with the principles stated above. A way to assesses the 'healthiness' of a product would be to ensure all foods that are to be fortified meet the NPSC. It may be that this would be a useful edit to the Ministerial Policy Guidelines

In summary, the Department would like FSANZ to consider:

- Further analysis of RTE breakfast cereal consumers and their vitamin D status from the AHS to determine if fortification is going to address the deficit.
- If RTE breakfast cereals are to be fortified with vitamin D then consider modifying the current draft variation to include - the addition of vitamin D to RTE breakfast cereals, can only be added if they meet the NPSC as outlined in Std 1.2.7 Nutrition, Health and Related Claims.