



Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610
Australia

February 24, 2015

via email to submissions@foodstandards.gov.au

Kellogg (Aust) Pty Ltd welcomes the opportunity to provide submissions in support of Food Standards Australia New Zealand for Application A1090 Voluntary Addition of Vitamin D to Breakfast Cereals.

As a company we have a long history of helping consumers meet their nutrient requirements through voluntary fortification of our breakfast cereals in line with Standard 1.3.2 of Australia New Zealand Food Standards Code (the Code).

Kellogg believes that any initiative in the nutrition area should be based on the latest scientific evidence linking nutrition with health, and should act to positively improve the overall nutritional intake of the population.

We believe that there is strong arguments in favour of the voluntary addition of Vitamin D to breakfast cereals is as follows:

- *Demonstrated population need.* The Australian Health Survey has established that Australians require additional vitamin D to meet their daily adequate intake. Not only is there is a significant Vitamin D shortfall, but few foods contain significant levels of Vitamin D. Scientific evidence continues to support the importance of Vitamin D for health. Eight pre-approved General Level Health Claims related to Vitamin D can be found in Standard 1.2.7. Nutrition, Health & Related Claims of the Code.
- *History of safe usage of Vitamin D in the food supply.* Vitamin D is already permitted under Standard 1.3.1 of the Code for voluntary fortification of dairy products, butter and formulated beverages as well as mandated fortification of table edible oil spreads and table margarines. This demonstrates that Vitamin D has a history of safe usage in the Australian food supply. The level of addition is regulated under this standard by established specific maximum levels and maximum claims. From a food manufacturer's perspective, over usage of fortificants such as Vitamin D would also be cost prohibitive.
- *Breakfast cereals are an obvious vehicle for fortification.* Breakfast cereals are an obvious vehicle for Vitamin D fortification because they are regularly consumed by the majority of the population. In addition, research shows that 90% of cereal is consumed with milk and the role of calcium in vitamin D absorption is well-established.

Fortification with Vitamin D is currently limited to a small number of foods, mostly dairy based. These foods are often not suitable for all consumers due to health, allergy, religious or cultural reasons. By permitting addition of Vitamin D to breakfast cereals it will provide consumers with another option to include vitamin D in their daily diet.

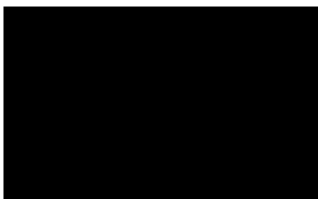
It is also worth noting that Standard 1.2.7 already has a system for establishing which products can make health claims through the nutrient profiling scoring system.

- *Global alignment.* There is global acceptance of Vitamin D fortification of food, including breakfast cereal. For example, regulatory authorities such as Codex Alimentarius, the European Union, USA and some Asian countries permit Vitamin D fortification of breakfast cereals. Health Canada also has issued a Temporary Marketing Authorization (TMA) to add vitamin D to select breakfast cereals.

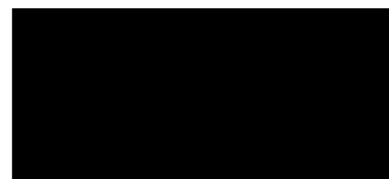
Kellogg is grateful for the opportunity to provide its views in support of this important change to the Code.

Should you need to discuss this submission or require further information feel free to contact us.

Yours faithfully



Research & Technology Director
Kellogg (Aust.) Pty Ltd



Food Regulatory Manager
Kellogg (Aust.) Pty Ltd