



**Grains &
Legumes
Nutrition
Council**

Cultivating Good Health

Grains & Legumes Nutrition Council

Submission

Review Consultation Paper: A1090 – Voluntary Addition of Vitamin D to Breakfast Cereal

5 August 2016

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PREFACE

This submission has been prepared by Grains & Legumes Nutrition Council™ (GLNC), the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- Bakers Delight
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia

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INTRODUCTION

The Grains & Legumes Nutrition Council (GLNC) appreciates the opportunity to respond to the review consultation paper: A1090 – Voluntary Addition of Vitamin D to Breakfast Cereal.

GLNC does not support the application of Nutrient Profiling Scoring Criteria (NPSC) to the previously recommended permission for addition of vitamin D to all breakfast cereal.

The Australian Dietary Guidelines and the New Zealand Food and Nutrition Guidelines for Healthy Adults and Children encourages the consumption of grain foods each day, mostly whole grain or high fibre as part of a balanced diet. As core grain foods, the consumption of ready-to eat breakfast cereal is consistent with these guidelines and does not contribute significantly to Australian added sugar (3%), salt (2.3%) or saturated fat (1.4%) intakes^{1, 2}, regardless of whether the breakfast cereal meets NPSC.

GLNC reinforces the need for strategies to reduce the risk of musculoskeletal conditions caused by Vitamin D deficiency such as rickets in children and osteopenia, osteoporosis and fractures in adults. In the most recent National Nutrition Surveys ready-to-eat breakfast cereals were consumed by 36% of the Australians (2 years and over)², 40% of New Zealand children (5-14 years)³ and 34% of New Zealanders aged 15 years and over⁴, identifying breakfast cereals as a suitable option for fortification as suggested by application A1090.

As per our earlier submission GLNC supports the voluntary addition of Vitamin D to breakfast cereals at levels proposed by FSANZ to increase the Vitamin D status of individuals whose Vitamin D status may be inadequate. However, GLNC believes there is community benefit to allowing the addition of Vitamin D to all breakfast cereals, without making this permission conditional to applying the NPSC.

GLNC is also aware that breakfast cereals are currently permitted to voluntarily add a number of other vitamins and minerals without passing NPSC. To introduce this criteria for Vitamin D would be inconsistent with these permissions and would create inequity in the 15% of breakfast cereals that do not meet NPSC.

Internationally permission has been given to add Vitamin D and other vitamins and minerals to breakfast cereals, without requiring these products to pass a nutrition profiling criterion. Applying NPSC as part of this review would therefore be inconsistent with international regulation.

The following GLNC submission is structured to answer the stakeholder questions provided in the consultation document.

STAKEHOLDER VIEWS AND EVIDENCE

Question 1

The basis of voluntary Vitamin D addition to breakfast cereal was public health need. In your view, is public health and safety protected by applying the NPSC to permission to fortify ready-to-eat breakfast cereal with Vitamin D?

GLNC believes that public health and safety is protected regardless of whether NPSC is applied to the permission to fortify breakfast cereals with Vitamin D.

The Australian and New Zealand Dietary Guidelines promote the consumption of breakfast cereals irrespective of whether they meet NPSC. Using NPSC to discriminate between breakfast cereals that are and are not eligible to use fortification would be inconsistent with these evidence based guidelines.

GLNC acknowledges that the Dietary Guidelines recommend limiting intake of foods containing saturated fat, added salt (sodium) and added sugars. However results of the 2011-12 Australian National Nutrition Survey show that the total breakfast cereal category contributed very little sodium (2.3%), saturated fat (1.4%), total sugars (3.4%)⁵ and added sugars (3%)¹ to the diets of Australians aged 2 years and above.

Additionally, a secondary analysis of the 2011-12 National Nutrition Survey commissioned by GLNC showed that breakfast cereals with >30% sugar or >35% sugar with added fruit, which are classified by the Australian Bureau of Statistics as discretionary choices only contributed 0.03 serves or 0.66% towards Australian total daily core grain serves⁶. Therefore while breakfast cereals classified as discretionary are higher in sugar, they contribute minimally to the average Australian diet making the restriction of Vitamin D fortification in these cereals largely unnecessary.

In another secondary analysis of the 2011-12 National Nutrition Survey commissioned by the Australian Breakfast Cereal Manufacturers Forum⁷, Australians who ate breakfast cereals (core and discretionary) were shown to have a more nutritious diet.

Compared to people who ate other breakfasts, Australian who ate breakfast cereal had:

- Significantly higher intakes of fibre, iron, calcium, folate and magnesium
- Lower intake of sodium
- Were more likely to meet nutrient targets

Australian adults who ate breakfast cereals also had slimmer waists and were more likely to be a healthy weight than those who ate other breakfasts, irrespective of whether the cereal met NPSC.

Overall, the evidence base shows that people who ate breakfast cereal, including those that don't meet NPSC, have higher quality diets, are more likely to meet nutrient targets and have the lower risk of overweight, obesity and chronic disease^{7, 8}.

Question 2

What are the positive and negative impacts on the breakfast cereal industry of permitting Vitamin D in all breakfast cereal?

The positive impact of permitting Vitamin D in all breakfast cereal is that manufacturers can use global vitamin and mineral premixes rather than those that have had Vitamin D removed, thus

potentially reducing production costs. This may reduce the cost for Australians to access breakfast cereals which are recommended by the Australian Dietary Guidelines.

Permitting Vitamin D fortification in all breakfast cereals would also help to reduce trade barriers as Vitamin D fortification is permitted in US, Canadian and UK breakfast cereals.

GLNC does not see any negative impacts.

Question 3

How (if at all) would these impacts differ if the permission were to be restricted to breakfast cereal that meets the NPSC?

GLNC believes it is not in public health interest to introduce a regulation that will potentially increase the cost of core grain foods. Restricting Vitamin D addition to only breakfast cereals that meet NPSC may require manufacturers to use different vitamin and mineral premixes for different breakfast cereals, increasing production costs. It would also increase the cost of importing breakfast cereals as manufacturers would need to specifically produce products with the modified fortification profile.

This cost increase would need to be passed on to consumers, potentially making it more expensive for Australians to access core grain foods that are recommended by the Australian Dietary Guidelines. This increased cost would be for both breakfast cereals that meet the NPSC and those that do not.

Question 4

What evidence do you have on the effects of added vitamins and minerals on consumers' perceptions of or choice of breakfast cereal product?

GLNC does not hold any evidence of the effect of adding vitamins and minerals to consumer choice. However, consumer research indicates price and taste are the strongest drivers of purchase intent suggesting fortification of ready-to-eat breakfast cereals is not a key driver of purchase intent for most consumers. Focus group studies conducted by GLNC indicated the key nutrient consumers look for in breakfast cereals is fibre.

Research by Nestle has shown that consumers are more persuaded by health claims linked to the addition of Vitamin D rather than just the presence of a nutrient claim. Since all products carrying health claims are required to meet NPSC anyway, it would seem that applying this restriction to the permission for addition of Vitamin D is unnecessary.

Question 5

What, if any, is the difference in consumers' response to the presence or absence of Vitamin D in food compared to their response to the presence or absence of other vitamins?

GLNC believes that without consumer education, the difference would be very little.

REFERENCES

1. ABS. *Australian Health Survey: Consumption of added sugars, 2011-12* Australian Bureau of Statistics; 2016.
2. ABS. *Australian Health Survey: Nutrition First Results - Foods and Nutrients, 2011-12*: Australian Bureau of Statistics; 2014.

3. Ministry of Health. *NZ Food NZ Children: Key results of the 2002 National Children's Nutrition Survey*: Wellington: Ministry of Health; 2003.
4. University of Otago & Ministry of Health. *A Focus on Nutrition: Key findings of the 2008/09 New Zealand Adult Nutrition Survey*: Wellington: Ministry of Health; 2011.
5. ABS. *Australian Health Survey: First Results* Australian Bureau of Statistics; 2011-12.
6. Nutrition Research Australia. *Secondary Analysis of the National Nutrition and Physical Activity Survey 2011-2012 commissioned by the Grains & Legumes Nutrition Council*. Unpublished 2015.
7. Australian Breakfast Cereal Manufacturers Forum (ABCMF). *Bowled over at Breakfast: New Australian data on the nutritional profile of the breakfast cereals and their impact on nutrient intakes and body weight*. ABCMF, Canberra, May 2016.
<http://www.cereal4brekkie.org.au/bowled-over-at-breakfast>.
8. Williams PG. The Benefits of Breakfast Cereal Consumption: A Systematic Review of the Evidence Base. *Advances in Nutrition: An International Review Journal*. September 1, 2014 2014;5(5):636S-673S.