



Application for the Fortification of Almond and other Nut and Seed- based Beverages

For submission to Food Standards Australia New Zealand,
P O Box 7186, Canberra BC ACT 2610, Australia

Australia New Zealand Food Standards Code – Table to
Clause 3 permitted addition of vitamins and minerals to food
by varying an existing standard, Standard 1.3.2 Vitamins and
Minerals

Submitted by Australasian Health & Nutrition Association Limited, trading as
Sanitarium Health & Wellbeing, 1 Sanitarium Drive, Berkeley Vale NSW 2261,
Australia

September 2014

3.1.1 Executive Summary

Sanitarium Health and Wellbeing is seeking permission to vary an existing standard, Standard 1.3.2 Vitamins and Minerals of the Australian New Zealand Food Standards Code. The variation would enable the voluntary addition of a range of vitamins and minerals to nut and seed-based beverages promoted as milk alternatives (such as almond 'milk') similarly to those permitted for addition to legume-based and cereal-based beverages (in Standard 1.3.2 these are known as Analogues derived from legumes and Analogues derived from cereals). If permitted, this will provide suitably nutritious milk alternatives for consumers who are allergic/intolerant to dairy, soy foods and/or cereal-based beverages or those who choose not to consume dairy products (or the above-named products) for health or philosophical reasons. These nut and seed-based beverages could be described as 'Analogues derived from nuts and seeds' forming a logical category of foods in table to clause 3 of ANZFS 1.3.2.

Permission is sought to add:

Vitamin A, Thiamin, Riboflavin, Vitamin B₆, Vitamin B₁₂, Vitamin D, Folate, Calcium, Magnesium, Phosphorus, Zinc, Iodine.

The forms of these nutrients proposed to be added are the same as those currently listed in ANZFS 1.1.1 SCHEDULE Permitted Forms of Recommended Dietary Intakes (RDIs) and Estimated Safe and Adequate Daily Dietary Intakes (ESADDIs) for Vitamins and Minerals. The permitted levels for addition and the permitted claim levels for these nutrients would be the same as that for "Beverages containing no less than 3% m/m protein derived from legumes" and also "Beverages containing no less than 0.3% m/m protein derived from cereals" in ANZFS Standard 1.3.2. As part of the safeguards to ensure responsible use, it is proposed that an advisory statement be included on fortified nut and seed-based beverages to the effect that the product is not suitable as a complete milk replacement for children under the age of five years. This approach would be similar to that in Standard 1.2.3 for Beverage Analogues derived from cereals. It is therefore requested that an amendment be made to Table to Clause 2 of Standard 1.2.3 to include the requirement for the statement to be present on labels of fortified nut and seed-based beverages.

The proposed fortification approach for nut and seed-based beverages aligns with the Australia New Zealand policy guideline 'Fortification of food with vitamins and minerals' (ANZ Food Regulation Ministerial Council, 2009) and also with international fortification policies. The proposed fortification fits well with the 'Specific order policy principles – voluntary fortification: To enable the nutritional profile of specific substitute foods to be aligned with the primary food (through nutritional equivalence)."

To align with the requirements for the addition of vitamins and minerals to beverage Analogues derived from cereals, as regulated in Standard 1.3.2 (3); Table to Clause 3, this application seeks to allow the addition of vitamins and minerals to "Analogues derived from

nuts and seeds” using the subcategory “Beverages containing no less than 0.2% m/m protein derived from nuts and/or seeds”. The 0.2% protein level is a result of both practical and technical issues and also captures most products available on the market.

The lower protein content of nut and seed-based beverages is comparable to cereal beverages and is unlikely to adversely affect the protein adequacy of adult consumers diets as the most recent Australian national nutrition survey found average protein intakes across all age groups exceeded requirements by some margin (ABS, 2014. First Nutrition Results. Table 1.1 Mean Daily Energy and Nutrient Intake.) Modelling and risk assessment of the likely situation in children has been previously undertaken by FSANZ (as part of the assessment of A500). Although this was completed before the 2011-13 Australian Health Survey data was obtained, it was found that young children (2 to 4 years) were most at risk of inadequate protein intake if consuming non-dairy milk alternatives, and an advisory statement was required. This analysis also concluded that non-dairy consumers were at risk of inadequate intakes of a number of vitamins and minerals ordinarily supplied by dairy foods, in particular calcium, magnesium, zinc, vitamin A, riboflavin, B₆ and iodine, with older consumers more at risk than the two to four year age group (FSANZ 2005a). The permitted fortification of cereal-based beverages may assist with addressing these potential inadequacies in cereal milk consumers; this application seeks to extend this principle to nut and seed-based beverages.