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File Ref:

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Standards Management Officer
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Dear Sir / Madam

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

Thank you for the opportunity to provide a submission on the paper *Review Consultation Paper – Application A1090*.

This submission provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Question 1: The basis of voluntary vitamin D addition to breakfast cereals was public health need. In your view, is public health and safety protected by applying the NPSC to permission to fortify ready-to-eat cereal with vitamin D? Please provide evidence for your view.

Response:

Breakfast cereals high in added sugar, salt and fat are considered discretionary choices and are not a necessary part of the diet and not appropriate for fortification.

The review consultation paper indicates that applying the NPSC will exclude approximately 15% of the ready-to-eat breakfast cereal market. These cereals will contain high levels of added sugar and/or salt, not contain fruit and be more appealing to children.

Applying the NPSC to exclude these breakfast cereals from fortification appears to achieve the intent of the Ministerial Policy Guideline.

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In an analysis of the National Nutrition and Physical Activity survey 2011/12, the Australian Bureau of Statistics (ABS) determined that breakfast cereals with more than 30g sugar per 100g or breakfast cereals with added fruit that have more than 35g sugar per 100g are discretionary foods. The Review Consultation Paper does not specifically mention if FSANZ considered application of this tool.

Queensland Department of Health analysis of breakfast cereal categories indicates that applying the NPSC produces a consistent outcome to the ABS approach when assessing the suitability of breakfast cereals for everyday consumption. All cereals with an NPSC score less than 4 had a total sugar content less than 30g/100g or 35g/100g with added fruit.

In this instance, applying the NPSC is likely to exclude breakfast cereals from voluntary fortification with Vitamin D considered to be discretionary choices by the ABS and to be consistent with nutrition guidelines.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Unit, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

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Queensland Government