



2 March 2015

Project Officer Application A1090  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

Dear Sir/Madam

**Application A1090 – Voluntary Addition of Vitamin D to Breakfast Cereal - Call for Submissions**

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

Based on the information provided, we support the draft variation proposed by FSANZ to permit the voluntary addition of vitamin D (permitted forms of D2 and D3) in amounts up to 2.5 µg (25% RDI) per normal serving of breakfast cereals.

MPI notes the FSANZ assessment which concluded that D2 and D3 were considered to be bioequivalent when present in fortified foods. This conclusion was also reached by the Institute of Medicine (IOM) which stated that at low doses comparable to the amount contained in food, D2 and D3 have equivalent potency.

In light of these conclusions, MPI would like FSANZ to clarify in the Approval report the ability to make claims for both permitted forms of vitamin D. In the schedules (in both the current Code and P1025 revised Code) the RDI for vitamin D is stated as 10µg cholecalciferol. Clarification in the Approval report is sought as to whether the RDI can be applied to both cholecalciferol (vitamin D3) and ergocalciferol (vitamin D2) as they are both deemed to be equivalent. This impacts on the ability to make nutrient content and/or health-related claims when vitamin D is added in the form of D2.

Yours sincerely

  
**Manager Food Science and Risk Assessment**

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