

submissions

From: [REDACTED]
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To: submissions
Cc: [REDACTED]
Subject: Response to Public Consultation: A1090 Voluntary Addition of Vitamin D to Breakfast Cereal

Response to Public Consultation: A1090 Voluntary Addition of Vitamin D to Breakfast Cereal

Following is the response to the Public Consultation *A1090 Voluntary Addition of Vitamin D to Breakfast Cereal* from the Grains & Legumes Nutrition Council (GLNC). GLNC is the independent authority on 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 supports the application and the proposed amendments to *Standard 1.3.2 – Vitamins and Minerals* in the *Australia New Zealand Food Standards Code* to permit the voluntary fortification of “breakfast cereals as purchased” with vitamin D: D₂ and D₃ and to permit a maximum claim of 2.5µg, corresponding to 25% regulatory Recommended Dietary Intake (rDI), per normal serving.

GLNC supports FSANZ assessment that vitamin D fortification of breakfast cereals at the proposed levels has the potential to increase the vitamin D status of individuals whose vitamin D status may be inadequate, and does not pose a risk to public health and safety.

GLNC recognises that a significant proportion of the Australian and New Zealand populations have inadequate vitamin D status; with estimates that 31% of Australian adults⁽¹⁾ and almost 50% of New Zealand children and adults^(2, 3) have inadequate vitamin D status (serum 25-hydroxyvitamin D level <50nmol/L).

Given the health risks of vitamin D deficiency, which include an increased risk of musculoskeletal conditions, rickets in children, osteopenia, osteoporosis and fractures in adults, GLNC reinforces the need for strategies to improve the vitamin D status of Australians and New Zealanders, such as the fortification of breakfast cereals.

The Australian Dietary Guidelines and the New Zealand Food and Nutrition Guidelines for Healthy Adults and Children Australians and New Zealanders encourage 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 cereals is consistent with these guidelines. In addition the most recent national nutrition surveys show that ready-to-eat breakfast cereals were consumed by 36% of the Australians (2 years and over)⁽⁴⁾, 40% of New Zealand children (5-14 years)⁽⁵⁾ and 34% of New Zealanders 15 years and over⁽⁶⁾, identifying breakfast cereals are a suitable option for fortification to improve the vitamin D status and the reduce the risks of vitamin D deficiency and related health risks among Australians and New Zealanders.

As a result, GLNC supports FSANZ proposed amendments to *Standard 1.3.2 – Vitamins and Minerals* in the *Australia New Zealand Food Standards Code* to permit the voluntary fortification of “breakfast cereals as purchased” with vitamin D which is consistent with the USA, Europe, the United Kingdom and some Asian countries where fortification of breakfast cereals with vitamin D is currently permitted.

Yours sincerely,

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Georgie Aley

References

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