

AI134 Review Consultation Paper
Increased Concentration of Plant Sterols in Breakfast Cereal
Submission by the Department of Health and Human Services Tasmania

Contact details:

██████████
Senior Public Health Nutritionist (Regulation)
Public Health Services, DHHS
PO Box 125 Hobart 7001
██
██████████

Thank you for the opportunity to comment on the Review Consultation Paper for Application AI134, *Increased Concentration of Plant Sterols in Breakfast Cereals*.

Nutrient criteria

Tasmania supports the adoption of restricting the application to healthier breakfast cereal options to prevent a potential halo effect of promoting high sugar, low fibre breakfast cereals that would not be consistent with the Australian Dietary Guidelines. We note that the specified nutrient criteria (SNC) for this application (less than 3g fibre/50g and no more than 30g sugar/100g), differs from the Nutrient Profiling Scoring Criteria (NPSC) used for establishing health claims. We understand this SNC is based on the current plant sterol standard (amendment 89 2006). While this SNC is more restrictive than the NPSC and supports healthy breakfast cereal choices consistent with dietary recommendations for heart health, it does raise an issue of having multiple criteria in use for the same food category.

Portion-controlled cereal serves

We support the FSANZ approach to widening this application to cover cereals that are not portion controlled. Our position is based on the original permissions for plant sterols in breakfast cereals not being specific to portion-controlled serves. This is consistent with Tasmania's point above regarding consistent regulation conditions for foods within the same category.

Dietary exposure and modelling

We note from the risk assessment that almost all exposure to plant sterols was from edible oils, with the contribution from other foods (milk and cheese) being less than 3%. This exposure is based on data collected in 2011-12 in Australia (and 2008 in New Zealand). It is likely that additional sterol-enriched products (spreads, milk, yogurt and cheese) came onto the market after this time so the exposure data may not be an accurate representation of current or future exposure as more of these products enter the market and are promoted. With the combination of the new health claims standard and improving technologies for incorporating plant sterols into foods, consumption is likely to increase.

The risk assessment models a "worst case" scenario based on baseline exposure and plus breakfast cereal consumption at the proposed new maximum concentration. However, exposure would be higher if a consumer actively sought to use the full range of sterol-enriched products currently available (spread, milk and yogurt) as well as breakfast cereal at the increased concentration in the current application. While we acknowledge the scenario may be rare given generally low product uptake and their high cost, this modelling may more closely demonstrate "worst case" scenario and is worth considering.

Cautious expansion and monitoring and surveillance

Tasmania supports FSANZ approach with this application that although the continuing novelty of plant sterols is debatable, assessment within the novel foods framework is protective of public health and safety. We support the notion that future assessments need to facilitate 'cautious expansion' and emphasise the importance of considering the whole food supply as plant sterols are added to more and different types of foods and in higher concentrations. It is increasingly important to continue monitoring and surveillance within the food system as more of these products come onto the market and exposure increases amongst population groups who may seek out and use a variety of these novel products.