



Nestlé

Nestlé Submission

Application A1090

Voluntary Addition of Vitamin D to Breakfast
Cereal

Review Consultation Paper

August 2016

Regulatory Affairs Manager

Executive Summary

This submission is made on behalf of Nestlé Australia Ltd and Nestlé New Zealand Ltd., and Cereal Partners Worldwide (CPW).

Nestlé welcomes the opportunity to provide comments in response to the Application A1090 on the Voluntary Addition of Vitamin D to Breakfast Cereal – Review Consultation Paper.

Breakfast cereals are a suitable vehicle for fortification being a core food consumed by many Australians and New Zealanders. Permitting the addition of Vitamin D to breakfast cereals would have the positive effect of increasing the daily intakes of this vitamin (reducing deficiency where relevant) and conferring potential health benefits across these populations.

The scope of this review consultation paper is in relation to applying the nutrient profiling scoring criterion (NPSC), to the addition of vitamin D to breakfast cereal, so that breakfast cereals that do not meet the NPSC would not be permitted to add vitamin D.

Nestlé and CPW support the voluntary addition of Vitamin D to breakfast cereals, without passing Nutrient Profiling Scoring Criterion (NPSC).

As the consultation review states, there is a community benefit to allowing the addition of Vitamin D to all breakfast cereals, without making this permission conditional on applying the NPSC.

Internationally, permission has been given to add Vitamin D and other Vitamins and Minerals to Breakfast Cereals, without requiring these products to pass a nutrition profiling criterion. Not applying NPSC would be consistent with international regulation.

Breakfast cereals are already permitted to voluntarily add a number of other vitamins and minerals without passing NPSC. To introduce this criteria for Vitamin D is inconsistent with these permissions and would create inequity in the 15% of Breakfast Cereals that don't meet NPSC.

Our internal research has shown that consumers are more persuaded by health claims linked to addition of Vitamin D rather than presence claims. As all products carrying health claims are required to meet NPSC, it would seem that applying this restriction to the permission for addition of Vitamin D is unnecessary.

QUESTIONS

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

The benefits of breakfast cereal will remain regardless of whether NPSC is applied to permission to add vitamin D to breakfast cereal. Recent secondary analysis of the 2011-2012 National Nutrition and Physical Survey as part of the Australian Health Survey (1), demonstrates that Australians eating breakfast cereal have more nutritious diets.

Compared to people who ate other breakfasts, Australians who ate breakfast cereals had:

- Significantly higher intakes of fibre, iron, calcium, folate and magnesium
- Lower intake of sodium
- Were more likely to meet nutrient targets.

Furthermore, Australian adults who eat breakfast cereal have healthier weight. Adults who ate breakfast cereals had slimmer waists and were more likely to be a healthy weight than those who ate other breakfasts.

The evidence base shows that breakfast cereal consumers have higher quality diets, are more likely to meet nutrient targets, and have the lower risk of overweight, obesity and chronic disease.

(1) ABCMF. 2016. Bowled over at breakfast. New nutrition data on the nutritional profile of breakfast cereal and their impact on nutrient intakes and body weight. <http://www.cereal4brekkie.org.au/bowled-over-at-breakfast/>

2) What are the positive and negative impacts on the breakfast cereal industry of permitting vitamin D in all breakfast cereal?

CPW manufactures in Australia over 50 breakfast cereal products for the Australian and New Zealand markets. These cereals all meet nutrition profiling as set out in Standard 1.2.7 Nutrition and Related Claims Standard.

These cereal products are an ideal vehicle to enhance the already healthy breakfast choice of many Australians and New Zealanders, and the draft regulatory measure of permitting voluntary addition of Vitamin D to breakfast cereals is supported.

A positive impact of permitting Vitamin D in all breakfast cereal, is that manufacturers can use global vitamin and mineral premixes rather than those that must have Vitamin D removed. This helps keep costs down and improves manufacturing efficiency.

3) How (if at all) would these impacts differ if the permission were to be restricted to breakfast cereal that meets the NPSC? Please provide data or evidence to support your response.

All of the CPW breakfast cereal range meet NPSC. Therefore there would be no impact to CPW of restricting permission to add Vitamin D to breakfast cereal that meets NPSC.

4) What evidence do you have on the effects of added vitamins and minerals on consumers' perceptions of or choice of breakfast cereal product?

CPW has conducted different qualitative research on different demographics with consumers which shows that they do have an awareness that vitamins and minerals are added to breakfast cereals, but don't generally identify specific vitamins or minerals.

The benefits that consumers (mainly mothers) attribute to added vitamins and minerals are general, not specific, and in relation to children's healthy growth.

5) What, if any, is the difference in consumer's response to the presence or absence of vitamin D in food compared to their response to the presence or absence of other vitamins? Please provide the evidence used to inform your response.

A CPW quantitative research study conducted in 2015 (available on request) looked at a

number of different health claims / statements that could be communicated on breakfast cereals, to different demographics, with varying levels of response rated on a persuasion index.

Based on a persuasion index, consumers (across all demographics) rated a claim on vitamins and minerals + wholegrains as much more persuasive than a claim highlighting the specific presence of Vitamin D and calcium together.

When consumers were shown a Vitamin D presence claim alone the persuasiveness ranked poorly compared to a health claim on Calcium and Vitamin D linked to a health benefit like bone health. The health claim effect was ranked higher when shown to mums.

This research shows that that consumers react more favourably on breakfast cereals communicating a health benefit linked to Vitamin D and calcium, rather than just a presence claim.

Since all products carrying health claims must also pass nutrient profiling criteria, it appears that restricting permission for addition of Vitamin D only to breakfast cereal passing nutrient profiling criteria is not necessary, since content claims are not overly appealing to consumers, according to this research.