

Response to

Call for submissions – Application A1134

Increased concentration of plant sterols in breakfast cereals

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Prepared by Dairy Australia

on behalf of the Australian Dairy Industry

Contact

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The Australian Dairy Industry

Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation

The dairy industry advocates the following core principles within which all regulatory requirements must operate,

- Minimum but effective regulation that is risk (science or evidence) based;
- Outcomes focussed;
- Proportionate to risk;
- Nationally consistent and enforceable;
- Support innovation;
- Support and promote international and domestic trade; and
- Support competition.

Dairy Australia welcomes the chance to present this submission in response to Application *A1134* - Increased concentration of plant sterols in breakfast cereals, providing the following comments for consideration.

Key points

- Dairy Australia believes FSANZ has made a good case for allowing an effective daily dose of phytosterols in a single serve of breakfast cereal, especially given there are minimal risks associated with increased intakes above current levels.
- Dairy Australia however, recommends that FSANZ develop a proposal for amending the Food Standards Code allowing for all current and future food categories permitted as vehicles for phytosterols and related compounds to contain an effective daily dose of up to 2.2g, or equivalent, in a single serving.
- This would most effectively deliver plant sterols into the food supply and provide consumers managing high cholesterol issues with a wider range of plant sterol fortified food options. Dairy Australia strongly recommends consistency in how maximum permissible amounts of plant sterols are applied across different food categories, including dairy foods. We foresee minimal risks from over consuming plant sterols if both cereals and dairy foods are fortified at this level, as *A1134* notes there are unlikely to be safety concerns consumption of plant sterols at the 5.4-6 g level.
- Higher permissions should not be restricted to one particular food product and consideration of this application should allow room for other foods. Dairy Australia's key concerns with *A1134* is that it will provide an inequitable advantage for plant sterol fortified cereals, over other fortified products, such as plant sterol fortified milk, yoghurt and cheese (currently permitted in low-fat products).

- Current and proposed permissions are outlined below; *A1134* allows much higher fortification permissions for plant sterols in cereals, particularly when compared with milk and yoghurt:

Food vehicle	Maximum permissions
Proposed cereals permission	0.5 - 2.2g/serve
Milk/ plant sterol permission	3 - 4g/L= 0.75 - 1g/250mL serve
Yoghurt/ plant sterol permission	0.8 - 1.0 g/package
Lower fat cheese/ plant sterol permission	1.1 – 2.2 g per slice of individually wrapped cheese/2.2 g per 40 g mini tub of cream cheese.

- *A1134* suggests that disadvantages exist between breakfast cereals and other food categories (such as dairy foods) as the current regulatory permission for their use in breakfast cereals in Australia is too low. However, should *A1134* be successful, there will be significant benefit to the cereals category as consumers may increase their plant sterol intake from cereals products, compared to dairy foods (milk, cheese and yoghurt). Given few Australians are meeting the recommended serves of five food group foods, with fewer meeting the dairy food group recommendations (one in ten), compared to the cereals food group (one in three),¹ lack of parity between food groups should be considered.
- *A1134* states that the cereal sector is at a disadvantage compared with other categories with plant sterol permissions (such as dairy), with one reason being these foods are 'routinely consumed through more than one serving'. However, the Australian Health Survey data shows on average Australians are consuming less than the recommended serves for all core dairy foods, with Australians consuming just over half a serve of milk (148mL), one tenth of a serve of yoghurt (24g) and a third of a serve of cheese (12g).²
- To maximise public health benefits, and due to no identified safety concerns with consumption of plant sterols at 5.4-6 gram level, it is recommended that FSANZ develop a proposal for amending the Food Standards Code allowing for all current and future food categories permitted as vehicles for phytosterols and related compounds to contain an effective daily dose of up to 2.2g, or equivalent, in a single serving.

¹ Australian Bureau of Statistics. Canberra: ABS; 2016. Australian Health Survey: Australian Health Survey: Consumption of Food Groups from the Australian Dietary Guidelines, 2011-12. Cat 4364.0.55.01

² Australian Bureau of Statistics. Australian Health Survey: Nutrition First Results – Foods and Nutrients, 2011-2012; Cat No. 4364.0.55.007. Australian Bureau of Statistics: Canberra, Australia, 2014.