



16 October 2015

Project Officer Application A1104  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036



Dear Sir/Madam

**Application A1104 – Voluntary Addition of Vitamins and Minerals to Nut and Seed-based Beverages –  
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 vitamins and minerals to nut and seed-based beverages for the purposes of nutritional equivalence with full cream cows' milk.

The draft variation extends the existing fortification permissions of cereal-based beverages to include nut and seed-based beverages, and applies the same labelling requirements, claim conditions and comparative food group to nut and seed-based beverages. The fortification permissions enable nutritional equivalence those vitamins and minerals which are considered in cows' milk.

The assessment concludes that, as with other fortified plant-based milk substitutes, the added vitamins and minerals would be adequately absorbed. The addition of vitamins and minerals to nut and seed-based beverages will enhance the micronutrient profile of these products to a level comparable to cows' milk. It is expected that consumption of these fortified beverages will result in an increase in intakes of the added vitamins and minerals by those who do not consumed dairy foods. No risks were identified as part of the assessment with regards to excess intake of vitamins and minerals compared to consumption of milk.

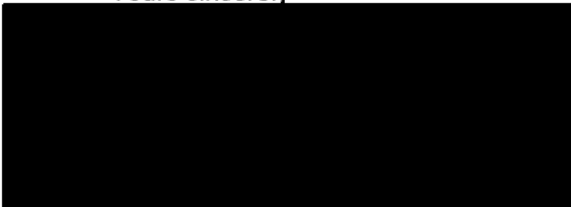

MPI notes that nut and seed-based beverages which are intended to be consumed as milk substitutes are relatively new products there has been steady growth in their market share since 2012. As the increase in market share of nut and seed-based beverages has coincided with a decline in soy-based beverages it is

considered important that the same voluntary fortification permissions are extended to this group for the purposes of nutritional equivalence with cows' milk.

MPI is satisfied that the draft variation fulfils all relevant statutory objectives, including the Ministerial Policy Guideline on *Fortification of Food with Vitamins and Minerals*.

MPI notes that the terminology used by manufacturers currently to describe 'coconut' based nut-based beverages as 'coconut milk' would not be in line with the definitions used in the Food Standards Code. It is noted that in Std 1.3.1 coconut milk, coconut cream and coconut syrup are a subset of 14.1.2.1 fruit and vegetable juices. 'Coconut milk' consumed as a beverage would not fit under 14.1.2.1 but 14.1.2.2 fruit and vegetable products.

Yours sincerely

  
  
**Manager Food Science and Risk Assessment**