

# **SUBMISSION**

on

## **Proposal P235**

### **Review of Food-Type Dietary Supplements**

On behalf of:  
Ceres Enterprises Ltd.  
3 Donnor Place  
Mt Wellington, Auckland



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## **1. Purpose of our submission**

The purpose of the submission on behalf of Ceres Enterprises is:

*To formally request FSANZ to make a provision to allow enriched rice milks to remain on the market as a Food-Type Dietary Supplement or an appropriate alternative food category.*

Ceres Enterprises is the importer of Rice Dream Enriched.

While the submission is being made on behalf of enriched rice milks in general, the specific product information is based on Rice Dream Enriched.

## **2. About Rice Dream Enriched**

Original Rice Dream Enriched is a non-dairy, non-soy beverage made from rice, filtered water, certified organic brown rice, expeller pressed high-oleic safflower oil, sea salt, vitamins A, B12, D2 and calcium.

Other variants - Chocolate Rice Dream Enriched and Vanilla Rice Dream Enriched- are made with flavourings and non-organic but non-genetically modified brown rice.

The gentle hint of sweetness in Rice Dream Enriched comes entirely from the naturally occurring sugars in brown rice – no other sweeteners are added. Nearly 100% of the sugars in Rice Dream are maltose sugars; a disaccharide sugar which metabolises more slowly into the bloodstream than glucose, a simple sugar. It has no cholesterol and is easily digested. It is low in fat and contains no artificial flavours, colours, hormones or preservatives.

### **1. The Requirement for this product: Dairy and Soy allergies**

It is estimated that between 1 and 3% of people suffer from lactose intolerance, that is, an inability to digest dairy products.

“Although estimates vary, the prevalence of cow's milk protein allergy is about 1% to 3%.<sup>i</sup>” “Although soy protein allergy is less common than cow's milk protein allergy, some children who experience adverse reactions to cow's milk protein experience similar reactions to soy protein.<sup>ii</sup>”

Cow's milk is one of the most common causes of food allergy, especially in young children. Additionally, World Health Organisation figures estimate that up to 70% of the world's adult population may be lactose intolerant.

Although this is not indicative of the New Zealand population, 47.4% of the members of Allergy New Zealand (545 people) have indicated that they have a dairy allergy. Of these people, 23.85% (130 people) also indicated that they had an allergy to soy.

Enriched rice milk is relied on heavily by these allergy sufferers as a way to keep a dairy-free and/or soy-free diet. “Substitutes for milk suitable for older children and adults are... - rice-milk is least likely to trigger an allergic response or to further sensitise an allergic child. It is a delicious substitute for milk.<sup>iii</sup>”

## **2. Composition & Safety**

Rice Dream Enriched is made from water, rice and oil with natural flavouring and vitamins. They contain no restricted botanical substances, and the levels of vitamins which they contain are well within the limits set by the RDA. Enriched formulas contain as much calcium, vitamins A & D as milk but Rice Dream is not a milk replacement; it is intended for use in a balanced diet.

### **4a. Addition of vitamins & minerals**

Section 2.4.1 of Proposal P235 discusses the four Codex principles for adding nutrients to foods, being

1. restoration (to moderate fortification levels);
2. nutritional equivalence of substitute foods;
3. fortification (to address public health need); and
4. ensuring the appropriate nutrient composition of a special purpose food.

We would argue that enriching rice milk with the above vitamins and minerals falls under “nutritional equivalence of substitute foods”, as Rice Dream Enriched contains as much essential calcium and vitamins A&D as milk.

Per 240ml serving, Rice Dream Enriched is fortified with the following vitamins & minerals:

1. 300 mg of Calcium (30% RDA)
2. 500 IU of vitamin A Palmitate (10% RDA)
3. 1.2 IU of vitamin E (4% RDA)
4. 2.5 micrograms of vitamin D (25% RDA)
5. 1.5 micrograms of vitamin B12 (25% RDA)

Below is a proposed Nutritional Information Panel for over-stickering, based on the ANZFA Regulations. We are aware that there may be additional requirements for Food-Type Dietary Supplements.

<b>Nutrition Information: Rice Dream Original Enriched</b>						
<b>Ingredients:</b> Filtered water, certified organic brown rice (partially milled)*, expeller pressed high oleic safflower oil, sea salt, vitamins and minerals (calcium, vitamin A, vitamin B12, vitamins D2)						
Servings per package: 4						
	Per 240 ml serving		% RDI	Per 100 ml		%RDI
Energy	500	kJ	-	208.3	kJ	-
Protein	1	g	-	0.4	g	-
Fat, total	2	g	-	0.8	g	-
- Saturated	0	g	-	0.0	g	-
Carbohydrate, total	25	g	-	10.4	g	-
- Sugar	11	g	-	4.6	g	-
Sodium	90	mg	-	37.5	mg	-
Vitamin A	500	IU	10%	208	IU	4%
Vitamin D	100	IU	25%	42	IU	10%
Vitamin E	1.2	IU	4%	1	IU	2%
Calcium	300	mg	30%	125	mg	13%
Phosphorus	150	mg	15%	63	mg	6%
Vitamin B12	1.5	mcg	25%	1	mcg	10%
Potassium	60	mg		25	mg	
Suitable for people with dairy allergies. Not for use as an infant formula.						
Organically grown and processed in accordance with the California Organic Foods Act of 1990. Manufactured in California.						

#### **4b. Not for use as an Infant Formula**

As it states on the label, Rice Dream Enriched should not be used instead of infant formula, breast milk or cow's milk. Rice Dream Enriched is primarily a carbohydrate and is not an adequately balanced source of the protein, fat, amino acids, vitamins and minerals which a baby needs for proper growth. In fact, Rice Dream Enriched is not to be used as a single source of food.

Rice Dream Enriched beverage contains amounts of calcium, and vitamins A and D, comparable to cow's milk however it is NOT nutritionally identical to infant formula, breast milk or cow's milk and it should not be used to replace any of these foods. It is suggested that allergic persons contact a dietary professional to assist in coming up with a diet that includes Rice Dream Enriched. It would be necessary to add other foods or supplements to a diet to make certain that all their nutritional requirements are met. Children love Rice Dream Enriched and it is a good source of carbohydrates, and a great alternative to sugary, high fat, flavoured milk drinks.

## 5. Distribution

P235 expressed concern in section 1.4.4, section C, regarding “fringe” (less mainstream, imported) products which are sold in health food stores. Rice Dream Enriched is widely-accepted mainstream product. Ceres is the sole importer of this brand of product, and over 80% of sales are via major supermarkets.

## 6. About Ceres Enterprises

Ceres is a distributor of high-quality products to organic and health food shops, supermarkets, wholesalers and manufacturers throughout New Zealand. Now in our 20th year of business, we were one of New Zealand's first businesses devoted to organics.

Ceres prides itself on being a quality enterprise which encourages sustainability of the earth and of its people. Our products respect nature and support a healthier future.

For more information, please see our website – [www.ceres.co.nz](http://www.ceres.co.nz)

## Footnotes

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i US National Dairy Council

[http://www.nationaldairycouncil.org/vl04/nutrilib/digest/dairydigest\\_683c.htm](http://www.nationaldairycouncil.org/vl04/nutrilib/digest/dairydigest_683c.htm)

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ii US National Dairy Council

[http://www.nationaldairycouncil.org/vl04/nutrilib/digest/dairydigest\\_683c.htm](http://www.nationaldairycouncil.org/vl04/nutrilib/digest/dairydigest_683c.htm)

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iii Allergy New Zealand, <http://www.allergy.org.nz/allergies/food/dairy/>