

16 October 2015

Standards Management Officer
Food Standards Australia New Zealand
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Application A1104 - Voluntary Addition of Vitamins & Minerals to Nut- and Seed-based Beverages

The AFGC supports FSANZ's proposed response in relation to Application A1104, *Voluntary Addition of Vitamins and Minerals to Nut- and Seed- based Beverages*. Recent product innovation has seen the development of beverages such as almond milks as analogues for dairy milk, in addition to the existing range of legume- and cereal-based milk analogues.

It is appropriate to allow, in the new nut and seed analogues, vitamin and mineral fortification at levels equivalent to those permitted for cereal- and legume-based beverages. This will permit nutritional equivalence (at least in relation to key micronutrients) among the non-dairy milk analogues which are all intended to serve the same nutritional purpose in diets, and thus expand the options for consumer choice and preference.

The AFGC further supports the extension of the advisory statements (as per Standard 1.2.3), which currently apply to cereal based beverages with less than 3% protein or 2.5% fat, to nut- and seed-based beverages under those same thresholds. This ensures consistency of labelling requirements for dairy analogues, enabling consumers to be adequately informed.

The AFGC notes that the definition for nut- and seed-based beverages proposed in A1104 extends to coconut-based milk substitutes (but not to other coconut beverages such as coconut water). The AFGC understands that coconut milk would not usually contain the 0.3%*m/m* protein necessary to qualify for fortification, meaning these products would need to be blended with other cereals, nuts or seeds to boost the protein level in order to be fortified. If FSANZ considers that coconut milk should be permitted to be fortified in its own right (and there would be organoleptic changes if blending were required), it would need to consider allowing a lower protein threshold for fortification (eg 0.2%*m/m*). FSANZ should consider whether a specific fortification threshold for coconut could be implemented as part of this Application or should be considered separately, but as drafted it is unlikely that coconut milks would qualify for fortification.

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Yours sincerely

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