



Food Standards Australia New Zealand
PO Box 7186
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Australia

Friday 16 October, 2015

Re: Application A1104 Voluntary addition of vitamins and minerals to nut- and seed-based beverages

A. Overview

Vitasoy Australia is a leading brand manufacturer and supplier of healthy plant-based beverage products, including Vitasoy Soy Milky, Vitasoy Rice Milk, Vitasoy Almond Milk, and recently Vitasoy Coconut Milk. Our Wodonga plant employs more than 80 people.

Vitasoy welcomes the opportunity to provide comment on the FSANZ Application A1104: Voluntary addition of vitamins and minerals to nut- and seed-based beverages.

Vitasoy supports the voluntary addition of vitamins and minerals to nut- and seed-based beverages, to allow for nutritional equivalence to cow's milk, at levels equivalent to those permitted for cereal- and legume-based beverages.

We also support the advisory statements, which currently apply to cereal based beverages with less than 3% m/m protein (as per Standard 1.2.3), to be extended to nut- and seed-based beverages, to ensure consistency of labelling requirements for dairy analogues, and enable consumers to be adequately informed at the point of purchase.

However, as the current definition for a nut- and seed-based beverage in Application A1104 includes coconut-based milk substitutes presented as a beverage (but not coconut water), we ask the fortification permissions for cereal-based beverages be reduced to 0.2% m/m protein – as opposed to 0.3% m/m protein – to accommodate coconut milk. Manufacturing limitations and processes for coconut milk do not allow inherent protein to reach the higher level of 0.3% m/m protein. If formulation changes are required, product stability and organoleptic properties would be highly compromised, as well as the nutrient profile (i.e. fat levels would be significantly raised). If not, we recommend a separate fortification permission be granted for coconut milk to recognise its inherent nutrient profile. If neither of these recommendations are possible, Vitasoy asks that coconut milk be excluded from this Application and hence the requirements for cereal, nut- and seed-based beverages outlined in the Food Standards Code.

B. Background

The current permissions for voluntary vitamin and mineral fortification of dairy analogues include cereal- (rice, oat, spelt) and legume- (soy) based beverages.

Since the introduction of nut- and seed-based beverages to the market, there is a discrepancy between what dairy analogues can fortify with vitamins and minerals.

The total nut- and seed-based beverages segment is driving category growth, now making up 36% of value share (Aztec Scan MAT 06/09/15). Coconut Milk contributes 6% of the total plant milk category and 21% of the total nut- & seed-based beverages category and is now the fastest growing segment (AztecScan MAT 06/09/15).

One in four households has purchased a plant-based beverage in the last year. Cow's milk remains the main milk purchased (63%), followed by consumers that purchase both cow's milk and plant-based milks (soy, cereal, nut, seed-based beverages – 22%), and then plant milk only (5%) (Aztec IHP MAT 23/8/15).

To reflect nut- and seed-based beverages being considered as dairy analogues, Vitasoy supports the extension of the vitamin and mineral fortification to nut- and seed-based beverages. Twelve vitamin and minerals are currently permitted to be added to a cereal based beverage containing no less than 0.3%*m/m* protein.

However, as the current definition for a nut- and seed-based beverage in Application A1104 includes coconut-based milk substitutes presented as a beverage (but not coconut water), Vitasoy recommends the fortification permissions for cereal-based beverages be reduced to 0.2%*m/m* protein – as opposed to 0.3%*m/m* protein. In comparing the 'inherent' nutrient composition of coconut milks currently on the marketplace, the protein levels range from 0-0.2% (see Appendix, Table 1 for the detail). We note, Table A1.1 from the Technical report of Application A1104 cites a protein range from 0-0.6% for 'Coconut-based milk substitutes'. However, this includes blends such as Pure Harvest Coco-Quench Coconut Milk – a combination of rice milk and coconut milk. Manufacturing limitations and processes for coconut milk do not allow inherent protein to reach this higher level. If formulations changes are required, product stability and organoleptic properties would be highly compromised, as well as the nutrient profile (i.e. fat levels would be significantly raised).

A protein level of 0.2%*m/m* will accommodate the nutrient profile level of nut-and seed-based beverages on the market, consumed as dairy analogues.

If Standard 1.3.2 is not amended to accommodate the lower protein level of coconut milk, we recommend separate fortification permissions be granted for coconut milk to recognise its inherent nutrient profile.

Table A1.1 (cont'd): Nutrient content of cow's milk, coconut-based milk substitutes and soy-, oat-, rice-, almond-, almond blend- and other nut-based beverages

Nutrients	Cow's Milk	Almond-Based Beverage blends					Coconut-Based Milk Substitutes				Other Nut-Based Beverages			
per 100 mL	Milk, cow, fluid, regular fat (~3.5%) †	Vitasoy™ Soy & Almond Milk #	Vitasoy™ Oat & Almond Milk #	So Good™ Almond & Coconut Milk Original #	So Good™ Almond & Coconut Milk Unsweetened #	Australia's Own™ Almond & Coconut Milk #	So Good™ Coconut Milk Original #	Vitasoy™ Coconut Milk, added calcium #	Pure Harvest™ Coco Quench Coconut Milk #	Silk™ Original Coconut Milk (non-AustralianNZ) #	Australia's Own™ Macadamia Milk #	EcoMil™ Sesame Milk (non-AustralianNZ) #	Sol™ Sunflower Beverage (non-AustralianNZ) #	Alpro™ Hazelnut Drink (non-AustralianNZ) #
Energy (kJ)	281	256	332	113	70	272	183	124	262	140	121	214	122	121
Protein (g)	3.4	3.0	1.0	0.5	0.6	0.6	0.2	0.15	0.6	0	0.2	0.6	0.4	0.4
Total fat (g)	3.4	3.0	2.8	1.5	1.4	1.9	3.4	2	3.2	2.1	1.8	2.4	1.7	1.6
Saturated fat (g)	2.19	0.4	0.4	0.3	0.1	0.5	2.2	2	2.3	2.1	0.3	0.5	0.2	0.2
Monounsaturated fat (g)	0.89	2.8	1.6	0.8	0.9	1.3	0.5	0	0.8	0	1.4	1.4	ns	1.3
Polyunsaturated fat (g)	0.09	3.3	0.8	0.4	0.4	0.4	0.7	0	0.1	0	0.03	0.5	ns	0.1
Trans fatty acids (g)	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	ns	0.00
Cholesterol (mg)	10	0	0	0	0	0	0	0	0	0	0	0	0	0
Carbohydrates (g)	6	5.1	11.5	2.7	0.3	2.7	3.1	2.7	7.8	2.9	2.8	6.7	3.8	3.1
Total sugars (g)	6	3.8	2.8	2.5	0.1	2.7	2.9	2.5	3.8	2.5	0.2	3.4	2.9	3.1
Dietary fibre (g)	0	0.6	2	0.4	0.3	ns	0.1	0.2	ns	0	ns	0.2	0.4	0.3
Calcium (Ca) (mg)	104	120*	120*	75	75	ns	75	120*	ns	*	ns	ns	*	120*
Sodium (Na) (mg)	35	34	40	30	35	39	25	26	55	20	75	10	50	50
Phosphorus (P) (mg)	88	ns	ns	58	58	ns	44	ns	ns	ns	ns	ns	*	ns

*Please note, the protein figures for Vitasoy's coconut milks are currently being updated based on routine analytical validation of the nutrition information (previous figure: 0.15g/100mL).

Currently, Standard 1.2.3 requires the following advisory statement to be included on cereal-based beverages with <3% m/m protein:

Table 2: Mandatory advisory statements in the table to section S9—2

2	(a) A cereal-based beverage that contains less than 3% m/m protein. (b) An evaporated or dried product made from cereals that, when reconstituted as a beverage according to directions for direct consumption, contains less than 3% m/m protein.	the product is not suitable as a complete milk replacement for children under 5 years.
3	(a) A cereal-based beverage that contains: (i) no less than 3% m/m protein; and (ii) no more than 2.5% m/m fat. (b) An evaporated or dried product made from cereals that, when reconstituted as a beverage according to directions for direct consumption, contains: (i) no less than 3% m/m protein; and (ii) no more than 2.5% m/m fat. (c) Milk, or an analogue beverage made from soy, that contains no more than 2.5% m/m fat. (d) Evaporated milk, dried milk, or an equivalent product made from soy, that, when reconstituted as a beverage according to directions for direct consumption, contains no more than 2.5% m/m fat.	the product is not suitable as a complete milk food for children under 2 years.

Vitasoy supports the extension of these requirements to nut- and seed-based beverages to ensure consistency of labelling requirements for dairy analogues, and that consumers are adequately informed at the point of purchase.

However, if the fortification recommendations for coconut milk are not possible, Vitasoy asks that coconut milk be excluded from this Application and hence the requirements for cereal, nut- and seed-based beverages outlined in the Food Standards Code. It is



inappropriate for coconut milk to be included in the category of cereal, nut- and seed-based beverages if the minimum 0.3%*m/m* protein fortification permissions apply, when manufacturing limitations and processes for coconut milk do not allow inherent protein to reach this level.

C. Conclusion

Vitasoy welcomes your consideration of the preceding points, and looks forward to progressing the development of Application A1104 that permits the voluntary vitamin and mineral fortification of nut- and seed-based beverages – according to nutritional equivalence with cow's milk.

We believe the inclusion of the advisory statements – as per the requirements for cereal-based beverages – will ensure consistency of labelling requirements for dairy analogues and consumers are adequately informed at the point of purchase.

However, if the fortification recommendations for coconut milk are not be possible, Vitasoy asks that coconut milk be excluded from this Application and hence the requirements for cereal, nut and seed-based beverages outlined in the Food Standards Code.

Should you have any queries, or wish to discuss our submission further, please feel free to contact me on 03-9188 7003.

Yours sincerely

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 (Senior Brand Manager) on behalf of

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General Manager – Vitasoy Australia



Appendix

Table 1: Nutrient profile of Coconut milks and Coconut milk blends (accurate: October 2015)

Nutrients	Coconut Milk				Coconut Milk blends				
	Vitasoy Coconut Original	Vitasoy Coconut Unsweetened	So Good Coconut Unsweetened	Coles Coconut Unsweetened	Pure Harvest Coco Quench (rice blend)	So Good Almond & Coconut Original	So Good Almond & Coconut Unsweetened	Australia's Own Almond & Coconut Organic	Blue Diamond Almond & Coconut Unsweetened
per 100mL									
Energy (kJ)	134	99	142	101	262	113	74	130	73
Protein (g)	0.2*	0.2*	0.2	0.2	0.6	0.5	0.5	0.6	0.5
Total Fat (g)	2.2	2.2	3.4	2.5	3.2	1.5	1.5	1.9	1.3
Saturated Fat (g)	2.1	2.1	2.2	1.7	2.3	0.3	0.3	0.5	0.2
Monounsaturated Fat (g)	0.1	0.1	0.5	Not declared	0.8	0.8	0.8	1.3	0.7
Polyunsaturated Fat (g)	0	0	0.7	Not declared	0.1	0.4	0.4	0.4	0.3
Trans Fatty Acids (g)	0	0	0	Not declared	0	0	0	0	0
Cholesterol (mg)	0	0	0	Not declared	0	0	0	0	0
Carbohydrates (g)	2.8	0.8	0.7	0.3	7.8	2.7	0.4	2.7	1
Total Sugars (g)	2.7	0.2	0.6	0.2	3.8	2.5	0.2	2.7	0.2
Dietary Fibre (g)	0.2	0.6	0.1	<0.5	0	0.4	0.4	-	4.2
Calcium (mg)	120	120	75	80	-	75	75	-	80
Sodium (mg)	26	26	25	9	55	30	30	39	54
Phosphorus (mg)	-	-	49	21	-	58	56	-	-

***Please note, the protein figures for Vitasoy's coconut milks are currently being updated based on routine analytical validation of the nutrition information (previous figure: 0.15g/100mL).**

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