



15 December 2023

2024 New Zealand Total Diet Study Consultation
New Zealand Food Safety
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Tēnā koe

The New Zealand Food and Grocery Council (NZFGC) is pleased the Ministry for Primary Industries (MPI) is maintaining its regular pattern of Total Diet Studies in order, in particular to monitor trends in the food supply over time. New Zealand has a very good record of such studies internationally and the value to New Zealand but also for international comparisons.

We are very sensitive to the prospect of referring to contaminants and infants in the same sentence and the sensationalism that this might incur. We would be particularly interested in the communications approach that is proposed due to any unexpected results that the Study might generate.

We appreciate the thoroughness of the prioritisation process applied but as this is a Study specific to infants and toddlers, we ask that consideration be given to the following two issues.

Iron

According to many experts in New Zealand and overseas, iron deficiency is the most common micro-nutrient deficiency in the world. Iron deficiency results in widespread impairment in body functions. Starship Hospital reports that in New Zealand, around 14% of urban New Zealand (Auckland) children between 6 and 23 months have iron deficiency¹. For this reason we believe it would be pertinent to include iron as a nutrient in the 2024 Study.

Fortified beverages

In relation to the key foods list, we note that several foods have been added or removed based on relevance to the population group. Fortified (malt-based) beverages are one such food that has been included and we disagree. These foods are generally targeted at children 4 plus years of age, adolescents and young adults, and so may not be relevant for the study that targets infants and toddlers.

Ngā mihi nui

A handwritten signature in blue ink, appearing to read "Carole Inkster".

Carole Inkster
Policy and Regulatory Director

¹ <https://starship.org.nz/guidelines/iron-deficiency/>