

Standards Management Officer  
Food Standards Australia New Zealand (FSANZ)  
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AUSTRALIA

11 January 2013

***Submission on Application A1055 – Short Chain Fructo-oligosaccharides***

**A1055 Application to permit the optional addition of short chain fructo-oligosaccharides (scFOS) to Infant Formula Products, Foods for Infants, & Formulated Supplementary Foods for Young Children**

**INTRODUCTION**

GTC Nutrition, a subsidiary of Ingredion Inc. (USA), the Applicant of Application A1055, has prepared this brief submission, in response to the FSANZ call for submissions (17 December 2012).

GTC Nutrition would like to applaud FSANZ for the in depth risk assessment and technical analysis undertaken in response to the application, and the proposed outcome that scFOS<sub>(sucrose)</sub> be permitted for use in Infant Formula Products and Formulated Supplementary Foods for Young Children, at the same level as currently permitted for "inulin-derived substances" (IDS).

**SUBMISSION**

1. Provision of information

GTC Nutrition would like to draw attention to and propose amendment to the statement made in section 2.3.2 International Regulations of the Call for submission – Application A1055 paper:

*"Fructo-oligosaccharides with fructose units from two to four are designated as Generally Recognised as Safe (GRAS) by the USFDA in infant foods. Infant formula products are excluded from this GRAS notice".*

Two GRAS Notifications have confirmed the GRAS status in infant formula products of FOS with 2-4 fructose units.

- i. GRN000392 Determination of the GRAS Status of the Addition of Oligofructose to Infant Formula as a Nutritional Supplement (May 2011) (Pfizer Nutrition and Beneo Oraffi)
- ii. Addendum to the self-affirmed GRAS status of Short-Chain Fructooligosaccharides: Determination of GRAS Status of Short-Chain Fructooligosaccharides in Infant Formulas (Abbott Nutrition 2009). Evidence provided In Confidence at time of Application.

Therefore, GTC Nutrition suggests the statement is amended to read:

*"Fructo-oligosaccharides with fructose units from two to four are designated as GRAS by the USFDA in both infant foods and infant formula products".*

2. Terminology

Whilst GTC Nutrition agrees in principle with the introduction of a new general term in the Code, such as the proposed term "inulin type fructan" (ITF), which includes scFOS<sub>(sucrose)</sub>, we would like to comment in response to question 3 of 'Questions for submitters' (page 9).

*"Does the proposed terminology and definition provide clarity and consistency?"*

GTC Nutrition supports the proposed definition for the group of substances:

*'mixture of saccharide chains that have predominantly  $\beta(2-1)$  fructosyl-fructose linkages with or without a terminal glucose'.*

Although not in disagreement with the term 'inulin type fructan' (ITF), GTC Nutrition has some concerns at the use of a term that is not widely recognised outside of a limited range of academic literature. Nor is "ITF" consistent with terminology in other regulatory jurisdictions. From the manufacturing, commercial, consumer, and nutrition industry perspectives the term "ITF" is not recognised. Products containing ITF (or IDS) do not use such terminology in the Nutrition Information Panel, or Ingredients List. The terms that more widely recognised include: fructooligosaccharides (FOS), scFOS, oligofructose, polyfructose etc.

Therefore GTC Nutrition would seek clarification that the term ITF is for definition only, not intended labelling purposes, and that there will be the flexibility to use appropriate names on labels. In addition, GTC Nutrition would like to propose that associated with the technical definition, a statement such as *"ITF include a range of substances commonly referred to as fructooligosaccharides (FOS), short-chain fructooligosaccharides (scFOS), inulin, oligofructose, polyfructose and the like"* would better direct and assist users of the Code .

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Consultant (on behalf of GTC Nutrition)

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