

Comments from the Victorian Department of Health and Human Services and the Victorian Department of Economic Development, Jobs, Transport and Resources

Due date of submission – 4 December 2017

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to provide comments on Application A1142.

The Application A1142 has been submitted by Ingredion ANZ Pty Limited, and seeks to amend the *Australia New Zealand Food Standards Code* (the Code) to add a method of analysis (MoA) for a specifically named fibre, that is resistant starch. Food Standards Australia New Zealand (FSANZ) is proposing to amend section S11-4 of the Code to include AOAC¹ 2002.02 as a new MoA for resistant starch.

From the FSANZ assessment report it is understood that:

- resistant starch satisfies the definition of dietary fibre in Standard 1.1.2 of the Code
- it is present in the edible parts of plant materials and resistant to digestion in the small intestine and it is partially or wholly fermented in the large intestine
- replacement of digestible starch with resistant starch in a meal promotes modulation of blood glucose and laxation; and
- AOAC 2002.02 is appropriate as a prescribed regulatory method for measuring resistant starch as a component of dietary fibre.

Several international agencies (including Codex, the European Commission, and the US Food and Drug Administration) have recognised and recommend the AOAC 2002.02 as a MoA to measure resistant starch.

The departments note the value of a prescribed method that distinguishes resistant starch from other forms of dietary fibre in food products to enable declarations in the nutrition information panel, specifically when a nutrition content or general health claim is made.

The departments support the progression of Application A1142.

¹ 'Official Methods of Analysis of AOAC International', Eighteenth edition, 2005, published by AOAC International, Maryland USA