



A1142 – Addition of a Prescribed Method of Analysis for Resistant Starch

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The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 6000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on A1142 Addition of a prescribed method of analysis for resistant starch by FSANZ.

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DAA interest in this consultation

DAA is the peak professional body for dietitians in Australia and responsible for the Accredited Practising Dietitian (APD) program as the basis for self-regulation of the profession.

DAA advocates for a safe and nutritious food supply in which the community has confidence and which meets the nutritional needs of all Australians, including groups with special needs.

As experts in nutrition, APDs assist the general population and groups with special dietary needs to meet their nutritional needs. APDs also assist with the translation of food labels and nutrition content claims.

Recommendations

- DAA supports the application for the addition of a new analysis method to allow quantification of resistant starch however there are several broader issues DAA recommends are also considered.
- Allowing a new quantification method may have broader effects on measurement of total dietary fibre. In particular, the potential for flow on effects; more products may pass the Nutrient Profile Scoring Criteria and be eligible to make nutrient content and health claims and some foods may obtain a higher Health Star Rating in the absence of any reformulation. DAA recommends these broader effects also be considered in any change to measurement that will affect labelling/claims.
- Further to this, DAA recognises that rather than just adding to existing methods, this is an opportune time for a broader review of total dietary fibre assessment. Adopting a newer and complete method such as Rapid Integrated Fibre Method while phasing out older inferior methods should also be considered.

Discussion

DAA supports the addition of a method to measure resistant starch to the current dietary fibre methods. The addition of a method to measure resistant starch, and therefore enabling resistant starch to be listed on the nutrition information panel, has the ability to further support updated consumer messaging. However, we also wish to acknowledge that the discussion paper on A1142 does not adequately cover some of the downstream effects this could have and it also does not acknowledge that there are newer more complete dietary fibre assessment methods available that could replace the existing methods.

Issues for consideration with the addition of Resistant Starch measurement method 2002.02

DAA recommends further examination of the broader effects of addition of this assessment method. A number of food products already in circulation may be able to detect higher levels of total dietary fibre than previously detected with current methods. While it is appropriate that resistant starch is counted as part of dietary fibre, current scoring criteria already in use do not account for measurement of some resistant starch and therefore more products may pass the Nutrient Profiling Scoring Criteria (NPSC) than is currently the case. DAA are concerned about this as the calculator was designed with current detectable levels of fibre, and having higher levels entered to the calculator may erode the safeguards the criteria are designed for ensuring that only more nutritious foods are able to make nutrient content and health claims. While having more fibre will make a product more “healthful”, safeguards must ensure discretionary choices are not “improved” simply by added fibre where other ingredients may be deleterious. While it is hoped that the criteria are robust independent of such changes, we recommend an assessment of the impact on Health Star Ratings and NPSC be undertaken.

Recommendation for a review of total dietary fibre assessment methods.

DAA is aware that newer dietary fibre assessment methods such as Rapid Integrated Fibre Method (RIFM) are available and would be better suited to measurement of total fibre including resistant starch. A total assessment method would also add clarity for industry as to which ingredients meet criteria for dietary fibre. Rather than adding a new method to measure another subclass of fibre, i.e. resistant starch, DAA recommends a total dietary fibre method as preferable to ensure the total amount of fibre in all foods is captured. This is also important for food composition databases and negates any requirements for careful avoidance of double counting of fibre.

Introduction of a method such as RIFM could be undertaken over a period of time while current methods are phased out so as to minimise cost and disruption to businesses.