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Food Standards Australia New Zealand  
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Tēnā koe,

## **Application A1178 - Method AOAC 2017.16 as a new method of analysis for total dietary fibre**

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make:

We acknowledge that no method of analysis for dietary fibre is without limitations and that many of the currently available methods are likely to underestimate total dietary fibre. However, we do have some concerns that the adoption of this method (AOAC 2017.16) without restriction does not align with the definition of dietary fibre.

Under the Australia New Zealand Food Standard's Code's (the Code's) definition for dietary fibre, it is required it to have one or more of the following beneficial physiological effects: laxation, reduction in blood cholesterol or modulation of blood glucose. FSANZ's assessment concludes that galacto-oligosaccharides (GOS) in any form does not meet all the criteria for the Code's definition of dietary fibre and may result in an overestimation of total dietary fibre in GOS and IMO (isomalto-oligosaccharide)-containing foods. The definition and measurement of dietary fibre is a highly contentious area and as such the impact of any changes must be fully considered.

### ***Health Star Rating system***

The FSANZ assessment does not consider if there would be an impact to the Health Star Rating (HSR) system when using AOAC 2017.16 to measure total dietary fibre. Comparative to the nutrient profiling scoring criteria (NPSC), the impact on the HSR system could be greater, given it is aimed to be on at least 70% of intended products by November 2025. Furthermore, the HSR is an incremental rating system rather than a classification of whether a food is eligible or not for a health claim.

FSANZ estimated the potential overestimation of dietary fibre with the use of this method as an average of 0.85g for plant foods and 0.6g for dairy foods. This difference could be sufficient to increase over one modifying point in the HSR system. It is difficult to estimate the full impact of this change on Health Stars without comprehensive modelling, as the algorithm considers multiple nutrients (with different weighting for different categories) and increasing one fibre point may not have an impact on a products' overall star rating. However, for products on the cusp of another star rating it may increase their rating.

While there are a limited number of foods with synthetic GOS and IMO in the food supply, this may be subject to change, particularly if there may be some benefits to its addition regarding the HSR and NPSC algorithm.

In the HSR five year review, stakeholders expressed concern with the current types of dietary fibre permitted under the Code's definition and questioned whether all types would promote the same benefit. Allowing GOS (particularly synthetic forms) to contribute to dietary fibre content, despite it not meeting the Code's definition, will likely not be supported by some stakeholders, particularly public health groups. This may add to concerns around the integrity of the HSR system.

#### ***Policy Guidelines***

The assessment does not specify any policy guidelines that were considered applicable to this application. We consider that the '*Policy guideline on food labelling to support consumers to make informed healthy food choices*' is relevant to this work. The Dietary Guidelines refer to the importance of dietary fibre in the context of its health benefits; and the New Zealand Eating and Activity Guidelines also refer to the use of the HSR system to choose healthier packaged foods.

#### ***Impact on trade***

The assessment states that AOAC 2017.16 should be permitted without restrictions to enable trade, yet the assessment does not highlight any trading partners that currently use this method. Further, this method has not yet been adopted by Codex. At CCNFSDU41, the EU did express some concerns with this method's measurement of dietary fibre which have undetermined health benefits ([NFSDU/41 CRD 52](#)).

#### ***Conclusion***

In light of the issues that the method does not align with the Code's definition of dietary fibre for products containing GOS and IMO, NZFS supports Option 2: to permit AOAC 2017.16 as a dietary fibre method of analysis with restrictions against its use on foods containing GOS and IMO. It is particularly important that methods to measure dietary fibre align with the definition. Option 2 would ensure that the changes made to the Code to measure total dietary fibre do not have any unintended consequences on the desirability of adding synthetic GOS and IMO for any potential benefits to the HSR or NPSC of a product.

We welcome the opportunity to discuss these comments further.

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