



Government of **Western Australia**
Department of **Health**

Our ref:

Enquiries: [REDACTED]

FSANZ Submissions
PO Box 5423
Kingston ACT 2604

Dear FSANZ Submissions

**Submission – Application A1178 – AOAC 2017.16 as a method of analysis
for total dietary fibre**

Thank you for the chance to provide Department of Health Western Australia (WA)'s comments in response to Application A1178 – AOAC 2017.16 as a method of analysis for total dietary fibre (DF).

Overall Summary:

On the basis of the first call for submissions (1st CFS) document, the Department of Health WA is **not** able to support the Food Standards Australia New Zealand (FSANZ)'s recommended option; and does not support the progression of Application A1178 to change the Australia New Zealand Food Standards Code (the Code), at this time.

Comments

- Industry needs to analyse dietary fibre content in order to label the dietary fibre content in the nutrition information panel on the labels of packaged foods, and to make nutrition content or health claims. Whilst the new method AOAC 2017.16 offers some improvement over the current approved methods, it overestimates dietary fibre. Overestimation of dietary fibre has the potential to mislead consumers, whereas an underestimation does not.
- Non-digestible oligosaccharides galacto-oligosaccharides (GOS) do not meet the current definition for dietary fibre in the Code. FSANZ has clearly concluded that GOS do not demonstrate the 3 physiological effects i.e (i) laxation; (ii) reduction in blood cholesterol; (iii) modulation of blood glucose, required to comply with the definition of dietary fibre currently in the Code. In addition, FSANZ has not assess the physiological effect of isomalto-oligosaccharides (IMO).

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- It is unclear what the impact will be on the Australian and New Zealand food supply of providing industry with the ability to overestimate dietary fibre content using AOAC 2017.16. FSANZ has noted that there are currently low levels of naturally occurring GOS and IMO in the Australian and New Zealand food supply in foods currently locally produced, as the justification for permitting overestimation of GOS. However, the Department of Health WA understands that both GOS and IMO are often added to imported foods.
- It is unclear whether the acceptance of the AOAC 2017.16 method for dietary fibre would satisfy the international market standards, given it is not an accepted method for overseas trading partners.
- Given the importance of gut-health relationships from a public health perspective; the importance of not misleading consumers, along with market access/trade and compliance perspective, it may be worth undertaking a more comprehensive review of dietary fibre in the Code as a priority: including definition of dietary fibre, impacts on imported food compliance issues, as well as trading of Australian and New Zealand products in international markets and whether there is potential for AOAC 2017.16 to create a trade barrier.

Should you wish to discuss the above matter, please do not hesitate to contact [REDACTED] on [REDACTED]

Yours faithfully

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22 June 2021