

AI 190 - Call for submissions
2'FL in infant formula and other products
Submission by Public Health Services, Department of Health, Tasmania

Contact details:



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Thank you for the opportunity to comment on the call for submissions for Application AI 190 – 2'FL in infant formula and other products.

Application AI 190 seeks to permit the addition of an oligosaccharide, 2'-FL produced by microbial fermentation using GM production strains in both infant formula and formulated supplementary foods for young children.

Public Health Services, Tasmania notes this is the second application FSANZ has assessed for 2'-FL. The outcomes of the first application (AI 155) was clearly stated in the communique of the Australian and New Zealand Ministerial Forum on Food Regulation meeting 27 November 2020 that:

‘The Forum agreed by majority (not supported by New Zealand) to an amendment to AI 155 to review within five years from gazettal the permission to allow addition to infant formula products to determine whether there is sufficient evidence of a ‘substantiated beneficial role in the normal growth and development of infants, or a technological role’.

This request was based on the weak evidence of beneficial role in normal growth and development presented in AI 155. Application AI 190 is based on the same level of evidence with FSANZ concluding that the bifidogenic and anti-infective effect against invasive *C.jejuni* are biologically plausible. Public Health Services, Tasmania does not consider ‘plausible’ links to be an appropriate level of evidence given the vulnerability of infants.

However, Public Health Services Tasmania acknowledges the role of 2'-FL is to be reviewed within five years of gazettal of AI 155 (26 March 2020) and supports the progression of application AI 190. Public Health Services recommends FSANZ should make the applicant aware that FSANZ is required to review the level of evidence within five years of gazettal of AI 155.

Public Health Services Tasmania supports the exclusion of 2'-FL in formulated supplementary foods for young children and the prohibition on the use of the words ‘human milk identical oligosaccharides’, or ‘human milk oligosaccharide’, and abbreviations ‘HMO’, ‘HiMO’, or any word or words or abbreviations having the same or similar effect.