

# **New Zealand Food Safety**

Haumaru Kai Aotearoa

Project Officer Application A1190  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

17 August 2021

Tēnā koe,

## **Application A1190 2'-FL in infant formula and other products**

Thank you for the opportunity to comment on this application.

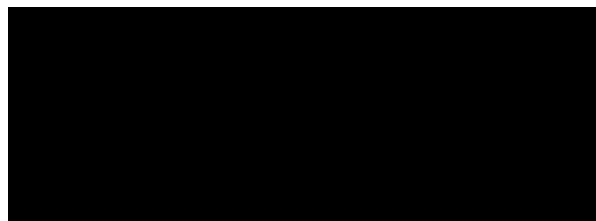
New Zealand Food Safety (NZFS) agrees with FSANZ's safety and risk assessment that there are no concerns associated with the voluntary addition of the applicant's 2'-fucosyllactose (2'-FL) to infant formula products and formulated supplementary foods for young children (FSFYC). We note that the applicant's 2'-FL is structurally and chemically equivalent to the naturally occurring form in human breast milk and that while the applicant's 2'-FL has a different source, it is also structurally and chemically identical to the 2'-FL already permitted in infant formula products in the Food Standards Code. Allowing an additional source of 2'-FL onto the market will also benefit the industry.

NZFS therefore supports permitting the voluntary addition of the applicant's 2'-FL to infant formula products at the existing permitted level in the Food Standards Code (96 mg/100 kJ or 2.4 g/L as consumed).

As per our previous submissions to the calls for submissions on A1155, NZFS supports the voluntary addition of 2'-FL also to FSFYC (Option 3), whilst we agree that they are not intended to be human milk substitutes nor are they necessary in the diets of most healthy young children. The voluntary addition of 2'-FL to FSFYC is safe, and in our view, consistent with the purpose of FSFYC in providing supplementary nutrition for young children, noting also that the Food Standards Code already permits other oligosaccharides to be added to FSFYC. Such a permission would also be consistent with a number of other jurisdictions internationally.

We note the conclusion of FSANZ's cost benefit consideration that given caregivers may be confused about the purpose and intent of FSFYC, permitting the voluntary addition of the applicant's 2'-FL in FSFYC may not be beneficial for all consumers. We are of the opinion that any broader concerns relating to the presentation of FSFYC and consumers' understanding of the purpose and intent of FSFYC should be addressed through a separate process and should not be the reason to not to allow the voluntary addition of the applicant's 2'-FL to FSFYC.

NZFS continues to support the existing labelling prohibitions for the use of the words 'human milk identical oligosaccharide' or 'human milk oligosaccharide', and abbreviations 'HMO', 'HiMO', or any word or words or



abbreviations having the same or similar effect, on infant formula products that contain 2'-FL. Should the voluntary addition of 2'-FL be permitted to FSFYC, NZFS would support the same labelling prohibitions to apply to those products as well.

