



MORINAGA MILK INDUSTRY CO., LTD.

To Whom It May Concern,

This is [REDACTED] Morinaga Milk Industry Co., Ltd., a dairy industry company in Japan. Here are our comments corresponding to your call named “Call for comment on bovine lactoferrin in infant formula products” dated on 6 October.

Morinaga Milk is the first company to have commenced a commercial production of lactoferrin in the world in 1989 from Milei GmbH, our subsidiary in Germany. Currently, we are holding the biggest production volume of lactoferrin in the world.

The quality of our lactoferrin has been accredited by US GRAS, Novel foods in EU, and compliance with GB standards, and has been globally applied to infant milk formula, foods for the elderly, health supplements, and general foods, demonstrating its excellent quality for a long time.

Furthermore, Morinaga Milk has researched lactoferrin for longer than 30 years with publications of approximately 150 research papers. With a lot of discoveries of functions and promotional/dissemination activities of lactoferrin, we are proud that we have contributed to people’s healthy lives.

As such, comments from Morinaga Milk will be of some help upon the revision of standard of lactoferrin by FSANZ’s. We are more than happy to have any queries/ comments for our comments from your end. Your reading and consideration would be highly appreciated.

Document: A1253 SD1

6 October 2022, 216-22, Supporting document 1

Risk, benefit and technical assessment – Application A1253

A1253 – Bovine lactoferrin in infant formula products

Page 8, Table 1 Proposed specification parameters for the bLf ingredient

1. Molecular formula $C_{141}H_{224}N_{46}O_{29}S_3$

Bovine Lactoferrin protein is glycosylated and has some variety of its glycan molecular weight. Therefore, it is not make sense to explain Bovine Lactoferrin molecular as one molecular formula and we propose to **delete this parameter** from specification.

2. Iron ≤ 15 mg/100g

In each bovine Lactoferrin international spec as “GRAS (US)”, “Novel foods (EU)”, and “GB (China)”, Iron content is specified as ≤ 35 mg/100g. We propose to change Iron content as ≤ 35 mg/100g to equalize to other bovine Lactoferrin international standards.



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3. pH (10% solution) 5.2-7.2

In each bovine Lactoferrin international spec as “GRAS (US)”, “Novel foods (EU)”, and “GB (China)”, pH is specified as 2% solution value. We propose to change **pH solution concentration as 2%** to equalize to other bovine Lactoferrin international standards.

4. Aflatoxin M1 $\leq 0.05 \mu\text{g/kg}$

In “GRAS (US)” bovine Lactoferrin international spec, Aflatoxin M1 is specified as $\leq 0.5 \mu\text{g/kg}$. We propose to change Aflatoxin M1 as $\leq 0.5 \mu\text{g/kg}$ to equalize to other bovine Lactoferrin international standard.

5. Others

This FSANZ standards is standards for infant formula. It would be great if you will also consider to automatically apply this standards for food for older people (>1 years child) which has low risk compared with less than 1 years old children.

<Attached document>

- Morinaga GRAS
- DMV GRAS
- Synlait GRAS
- Morinaga Novel foods
- DMV Novel foods
- GB standard

Concluded