



11 September 2017

Project Officer Consultation Paper W1109
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143

Dear Sir/Madam

Consultation Paper – W1109 – Consultation about beta-glucan and blood cholesterol health claims – Submission

Thank you for the opportunity to comment on this consultation paper. The Ministry for Primary Industries (MPI) has the following responses to the questions for submitters.

1. What do you consider to be the best approach for managing this food-health relationship in the Code, given the outcomes of the systematic review for the food-health relationship for a HLHC about beta-glucan?

MPI questions why FSANZ reviewed the scientific currency of these specific pre-approved food-health relationships and whether the intention is to review further pre-approved food- health relationships for GLHCs or HLHCs in the future? We understand the need for FSANZ to assess the scientific currency of the pre-approved food health relationships but note that many of these will be difficult to substantiate with evidence from systematic review because they are based on the essentiality of nutrients. How is FSANZ planning to assess which ones warrant being evaluated by conducting a new systematic review?

MPI considers that the systematic review conducted by FSANZ to review the evidence for a relationship between oats, barley and beta-glucan and blood cholesterol concentration is of high quality and we agree with the conclusions.

MPI considers that given FSANZ could not identify any randomised controlled trials measuring the effect of pure beta-glucan on reduction in blood cholesterol concentration, this is likely to apply to the food-health relationship between beta-glucan and reduction in dietary and biliary cholesterol absorption as well. Therefore we consider that the current pre-approved food-health relationship referring to beta-glucans from oats or barley and reduction

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in cholesterol absorption should be removed from Schedule 4 – 5, as the wording of the food-health relationship cannot be amended without a systematic review.

MPI also considers that to be able to determine if there is scientific evidence to support a food health relationship between oats/barley and cholesterol absorption in line with the systematic reviews conducted for the HLHC, FSANZ would need to conduct a systematic review to assess the evidence for the food-health relationships “*Dietary intake of wholegrain oats or oat bran reduce dietary and biliary cholesterol absorption*” and “*Dietary intake of wholegrain barley reduces dietary and biliary cholesterol absorption*”.

Does FSANZ consider that because one of the proposed mechanisms of action by which oats may alter the blood cholesterol concentration is the reduction in dietary and biliary cholesterol (re-)absorption, information from the trials included in the systematic review for the effects of oats and total and LDL cholesterol could be used to examine the food-health relationship addressing the outcome of reduced dietary and biliary cholesterol absorption?

MPI considers that in light of the outcomes of the systematic review, the food-health relationship for the HLHC stated in Schedule 4 – 4 should be changed to “*Whole grain oats and oat bran reduce blood total and LDL cholesterol*”. We consider that the wording should reflect the health effect considered in the systematic review “*reduces blood total and LDL cholesterol concentrations*”. We note that as per Standard 1.2.7 – 10 the Standard does not prescribe the words that must be used when making a claim, thus in a claim the health effect could still be “*reduces blood cholesterol*”.

Importantly this change in wording in Schedule 4 – 4 would also require the removal of the context statement referring to diets containing 3 g of beta-glucan per day as well as the addition of a context statement on the minimum amount of oats or oat bran needed to be consumed per day to attain the health effect. MPI considers that the current context statement referring to a diet low in saturated fatty acids should be retained.

MPI notes that the systematic review on the relationship between oats and blood cholesterol found no apparent dose-response effect and that the quantity (dry weight) for wholegrain oats ranged from 45 g to 109 g and oat bran from 20 g to 150 g /day. Therefore, will the lower end of both ranges form the basis for requiring a minimum level per day and/or in a defined portion in order to a food to qualify to make this claim, or would further review be required? Given the lack of randomised controlled trials examining the effects of pure beta-glucan, what was the basis for determining that 3 g beta-glucan was the effective dose previously?

In addition, the reference to wholegrain barley in column 5 (a)(iii) should be removed.

2. What do you consider to be the impacts of amending the Code for consumer understanding about beta-glucan, oats and barley and blood cholesterol?

MPI considers that a claim on wholegrain oats or oat bran is likely to be more consumer friendly as consumers eat whole foods, not individual components. We note from our most recent survey on claims in the NZ market that claims using the effected food-health relationships do exist (see further information in our response to Q4). Therefore changes required on food labels could affect both consumers and food manufacturers.

3. Do you consider that such amendments to the Code would be consistent with dietary guidelines and other relevant public health messages? Why/why not?

MPI considers that amending the food-health relationship would be consistent with dietary guidelines as guidelines refer to whole foods rather than individual components.

In the Eating and Activity Guidelines for New Zealand Adults Eating statement 1 includes enjoying a variety of grain foods, mostly wholegrain and those naturally high in fibre. Amount recommended is at least 6 servings per day. An example of a serving size given is ½ cup cooked porridge.

4. What do you consider to be the impacts on the food industry of such an amendment?

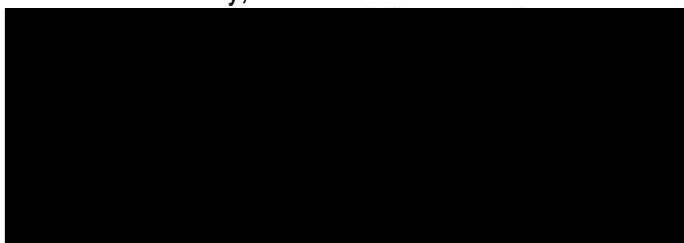
MPI considers that amending the wording of the food-health relationship of the HLHC would not necessarily result in a need for manufacturers to reformulate products as the current conditions in Schedule 4 include that the food must contain wholegrain oats or oat bran in addition to specific amount of beta-glucan. The products that have been making the HLHC, could most likely use the updated food-health relationship depending on the conditions set regarding the amount of oats or oat bran required for the health effect. Claims on barley products would no longer be able to be made.

MPI conducts periodically surveys to monitor the use of health claims on food products in New Zealand. The surveys examine a random selection of nearly 700 supermarket products, so do not provide complete coverage of any particular claim being used. However in the past two surveys we identified following claims on rolled oats and breakfast cereals containing oats based on the pre-approved GLHC. We have not identified any products using the HLHCs.

Examples of on-pack health claims being used in NZ:

- 1) Front of pack: *"Helps lower cholesterol re-absorption"* and back of pack: *"As part of a healthy diet low in saturated fat 3g of beta-glucan each day is required to help lower cholesterol absorption"*
- 2) *"Oats may help lower cholesterol re-absorption"*
- 3) *"Beta-glucan from wholegrain oats to help lower cholesterol re-absorption"*

Yours sincerely,



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