

# NUTRICIA

Australia

Submission regarding Application A1055, Short Chain Fructo-oligosaccharides

Dear Sir/Madam,

Nutricia Australia Pty Ltd wishes to provide comments on the Application A1055, Short Chain Fructo-oligosaccharides.

Nutricia supports breast feeding as the preferred and optimum method of feeding an infant. If, however, breast feeding or breast milk is not available for the infant, the only suitable alternative method of feeding is an infant formula product.

Nutricia supports the continued development of nutritional foods and food ingredients that support the specialised needs of groups within the overall population. The introduction of new food ingredients that have been appropriately scientifically validated has the potential to have profound effects upon the health and wellbeing of many people.

We make particular note of the documents released by Food Standards Australia New Zealand (FSANZ) on this application. We support the Consolidated conclusion provided in the Risk and technical assessment report (p 46) – Application A1055, that:

## **“6.2 Consolidated conclusion**

On the basis of these responses, it is concluded that scFOS produced by invertase-catalysed condensation of sucrose is technologically justified and is as safe as IDS already permitted to be added to foods generally, and to infant formula products, infant foods and FSFYC alone or in combination with IDS and/or GOS up to the currently permitted maximum concentrations. Additionally, scFOS has the potential to soften infant stools and may reduce the incidence of constipation, both of which are considered beneficial effects.”

Inulin derived substances (IDS) are already permitted in infant formula products, foods for infants and formulated supplementary foods and therefore scFOS<sub>INULIN</sub> is already permitted in these products.

The Application then establishes that scFOS<sub>SUCROSE</sub> is nature identical to scFOS<sub>INULIN</sub> and is as safe to use in food products as scFOS<sub>INULIN</sub>. It is therefore appropriate for this form of scFOS to be permitted for use in infant formula products, foods for infants and formulated supplementary foods at the same levels as the already permitted ingredients.

In providing permission for the use of scFOS<sub>SUCROSE</sub>, the definition of inulin-derived substances, as listed in Standard 1.1.1, requires amendment. The phrase, “but does not include those polymers of fructose produced from sucrose by enzymatic action” should be removed from the definition.

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We have concerns, however with the introduction of a new definition using the term “inulin type fructans”. We understand that this term has been used in some research papers (e.g. Boehm and Moro in *The Journal of Nutrition* 2008; 138: 1818S-1828S), however the use of the term “fructo-oligosaccharides” is widely in use in other regulatory agencies. The EU (EFSA Journal 2010; 8(3):1462 *Dietary Reference Values for carbohydrates and dietary fibre*) and the FAO/WHO (*Carbohydrates in human nutrition*; Report of a joint FAO/WHO Expert Consultation, Rome, 14-18 April 1997) both use the term “fructo-oligosaccharides” for these substances. Furthermore, the IUPAC/IUB *Joint Commission on Nomenclature of Carbohydrates* (1996) refers extensively to “oligosaccharides” in a large number of forms. We therefore strongly recommend the inclusion of the term “fructo-oligosaccharides (FOS)” within the definition.

We recommend that the definition of these substances be amended to read:

*“Inulin type fructan”, also known as “fructo-oligosaccharide” or “FOS” refers to a mixture of saccharide chains that have predominantly  $\beta(2-1)$  fructosyl-fructose linkages with or without a terminal glucose.*

Wherever the term “Inulin-derived substances” is used within the Food Standards Code, this should then be replaced with the term, “inulin type fructans, also known as fructo-oligosaccharides (FOS)”.

The remaining issue was the safety of the use the processing aid invertase, as derived from *Aspergillus niger*, when processing the sucrose to produce scFOS<sub>SUCROSE</sub>. The evidence presented confirmed that the use of *A. niger* in the production of the invertase and the use of the invertase in the production of scFOS<sub>SUCROSE</sub> raised no public health and safety issues.

Nutricia supports the approach to research and development that focuses upon the growth and development outcomes for infants and young children and how these can be maintained and improved. This outcome-based approach has implications for the assessment of a wider range of food ingredients to be used in infant formula products, foods for infants and formulated supplementary foods into the future.

Yours sincerely,

A large black rectangular redaction box covering the signature of the Regulatory Affairs Manager.

Regulatory Affairs Manager