



# A1123 Isomalto-oligosaccharide as a Novel Food

January 2017

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 6000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on the proposal A1123 Isomalto-oligosaccharide as a Novel Food by Food Standards Australia New Zealand.

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## **DAA interest in this consultation**

DAA is the peak professional body for dietitians in Australia and responsible for the Accredited Practising Dietitian (APD) program as the basis for self-regulation of the profession.

DAA advocates for a safe and nutritious food supply in which the community has confidence and which meets the nutritional needs of all Australians, including groups with special needs.

As experts in nutrition, APDs assist the general population and groups with special dietary needs to meet their nutritional needs. APDs also assist with the translation of food labels and nutrition content claims.

## **Recommendations**

DAA understands this application is to permit isomalto-oligosaccharide as a novel food to be used as an alternative (lower calorie) sweetener and bulk filler in a range of foods including carbonated beverages, sports and energy drinks, soy milks, milk-based drinks, milk-based and non-milk-based meal replacement drinks, fruit juices, fruit-flavoured drinks, meal replacement bars, breakfast bars and confectionery at levels up to 15 g IMO/serving.

DAA supports FSANZ draft variation to the Code which permits the use of IMO as an alternative sweetener and bulk filler, for the following reasons:

- IMO has a history of safe use in humans in countries other than Australia and New Zealand and is well tolerated i.e. no abdominal symptoms (e.g. laxative effects) in healthy humans up to a single daily dose of 40 g. In the absence of any identifiable hazard, an Acceptable Daily Intake (ADI) 'not specified' is considered appropriate. However, it is anticipated that IMO will be poorly tolerated by individuals with congenital or acquired sucrase-isomaltase deficiency.
- Generic labelling requirements would apply to provide consumers with information on the presence of IMO in food to enable informed choice. Additional information will be prepared for health professionals who support individuals with sucrase-isomaltase deficiency.

DAA have identified that the use of isomalto-oligosaccharide as a bulk filler up to the amount of 15g per serving could potentially lower the nutrient density of products with small serving sizes, for example breakfast bars with a 30g serving size.