



3 February 2017

Project Officer Application 1123  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

Dear Sir/Madam

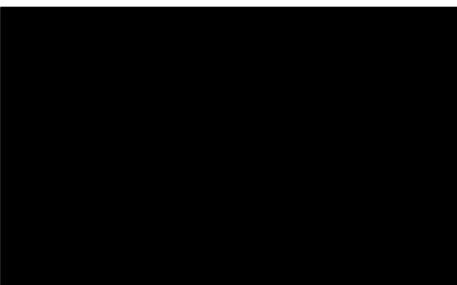
**Application A1123 - Isomalto-oligosaccharide (IMO) as a Novel Food – Call for Submissions**

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

MPI supports Option 1 and agrees that permitting the use of IMO as a novel food can benefit consumers as they can have additional choices on the market, particularly as this ingredient is already permitted by and used in many overseas jurisdictions.

As described in section 2.2.4.3, the energy contribution of IMO would depend on how it is used in the product.. Should there be a need for analysis, MPI would require access to the specifications of the ingredient. Standard 1.2.1 already requires the purchaser of the IMO to have access to product specifications. MPI considers that these specifications should enable an enforcement agency to check the calculations for the carbohydrate content on the label of a product that contains IMO.

MPI is satisfied that the risk assessment has addressed the concerns raised by the Advisory Committee for Novel Foods when IMO was put forward to them for an opinion. MPI is also satisfied that risk assessment shows that IMO is a relatively safe ingredient, and thus supports FSANZ's proposal to extend the Applicant's proposed list of foods to nearly all foods, except infant formula products, infant foods and formulated supplementary foods for young children, and not to impose a limit/serving.



**Acting Manager Food Science and Risk Assessment**