NEW ZEALAND
FOOD&GROCERYCOUNCIL

3 February 2017

Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the **Call for submissions – Application A1123: Isomalto-oligosaccharide as a Novel Food.**

Yours sincerely

Katherine Rich
Chief Executive

Call for Submissions – Application A1123: Isomalto-oligosaccharide as a Novel Food

Submission by the New Zealand Food & Grocery Council

3 February 2017

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the ***Call for submissions – Application A1123: Isomalto-oligosaccharide as a Novel Food.***

2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over $34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over $31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

THE APPLICATION

3. Essence Group has applied for an amendment to the Australia New Zealand Food Standards Code (the Food Standards Code), to Schedule 25 – Permitted Novel Foods for isomalto-oligosaccharide (IMO) at levels up to 15 g IMO/serving. This would permit the sale and use of IMO powder as a food ingredient in Australia and New Zealand as an alternative (lower calorie) sweetener and bulk filler in a number of food categories excluding formulated supplementary food for young children and foods for infants.

OVERARCHING COMMENTS

4. NZFGC notes that there are no food technology, toxicological, or dietary exposure risks associated with IMO at the levels proposed. We appreciate the extension by FSANZ of the list of foods that IMO could be used in to all foods except infant formula products, food for infants and formulated supplementary foods for young children.

5. We note that several other countries approve the use of IMO and IMO has a long history of safe use in humans when added to foods and as a naturally forming substance in fermented products such as in soy sauce and sake and that there is no evidence of adverse effects in healthy humans at doses up to 40 g.

6. Even though there is a history of consumption of naturally occurring IMO, its wider spread use appears to have been the rationale for 'novelty'. NZFGC suggests that, as the basis for novelty, such concepts need to be considered further under Proposal P1024 Nutritive substances and novel food. Nonetheless, in the present case, we agree to an amendment to Schedule 25 for IMO as a novel food.

SPECIFIC COMMENTS

Risk and Technical Assessment

Food technology assessment

7. IMO was assessed by FSANZ as an ingredient and not as a food additive because IMO is intended to be used at reasonably high concentrations in food and not to perform exclusively technological purposes in food like a food additive. When IMO is used as an ingredient to replace sugars in the production of a food, it meets the stated purpose of a bulk filler and a sweetener with less sugars compared to sucrose.

8. There are currently no specifications for IMO within Schedule 3 of the Food Standards Code so FSANZ has drafted a new specification.

9. There are analytical methods available to identify and quantify the different oligosaccharides that make up an IMO preparation. These methods are based on using a High Performance Liquid Chromatography that is claimed to be applicable to separate, identify and quantify the IMOs from any other oligosaccharides that may be present in a food matrix.

Hazard assessment

10. IMO is not efficiently converted to glucose in the small intestine so the majority (~60–70%) of ingested IMO would likely pass unchanged into the colon where microbial fermentation would give rise to short-chain fatty acids, hydrogen, carbon dioxide and methane.

11. IMO shows no evidence of genotoxicity. IMO is, in practical terms, nontoxic in laboratory rats, and because there is no systemic exposure to any xenobiotic (foreign chemical substance), then reproductive or developmental toxicity is not anticipated.

12. IMO has a long history of safe use in humans when added and as a naturally forming substance in fermented products such as in soy sauce and sake and there is no evidence of adverse effects in healthy humans at doses up to 40 g. IMO would, however, be poorly tolerated by individuals with congenital or acquired sucrase-isomaltase deficiency, and labelling measures (in the ingredients list) would address this risk.

13. Based on the toxicological data and the absence of any identifiable hazard, FSANZ concluded that an Acceptable Daily Intake (ADI) of 'not specified' was appropriate.

Dietary exposure assessment

14. In light of there not being any acute or chronic health based guidance values established for IMO, the dietary exposure assessment supports the conclusion that addition of IMO at the requested levels to the proposed food categories would not pose a safety risk to the Australian and New Zealand populations. Even if nearly all foods in the proposed categories had 50% of added sugars replaced by IMO, and dietary exposure exceeded 40g/day, IMO may still be considered safe and suitable to be added to the food supply because no adverse effects have been identified.

Risk management

15. Although IMO naturally occurs in the likes of soy sauce and sake, FSANZ decided that there was not a history of consumption in Australia and New Zealand. This would seem somewhat contrary. Even though there is not a history of consumption in other food categories as an ingredient, there is a history of safe consumption in fermented products such as soy sauce and sake. It would seem that a wider spread use appears to have been the rationale for 'novelty'. NZFGC believes this such concepts as the basis for novelty need to be considered further under Proposal P1024 Nutritive substances and novel food.

16. That aside, as an ingredient, the key risk management measure would be listing in the ingredients and appearance as part of the sugar and dietary fibre figures in the nutrition information panel.

17. FSANZ is commended for extending the requested list of foods that may contain added IMO to nearly all foods except infant formula products, food for infants and formulated supplementary foods for young children.

18. We are surprised that FSANZ considers that enforcement agencies are the groups most equipped to have a view on the energy factor that should be applied to IMO for the purpose of calculating total energy in a product. We consider the IMO manufacturer would be best placed to make that assessment based on the available and unavailable carbohydrates in the product.

19. FSANZ did not propose any mandatory labelling in relation to diabetes because it considered that the glycaemic response to foods is highly variable and depends greatly on the food matrix, rather than the presence of a single ingredient, a position that NZFGC strongly supports.

International approvals

20. IMO is approved as an ingredient in the USA, Canada, UK/EU, Japan, China and Korea.

Conclusion

21. In light of its assessment and consideration, FSANZ concluded that inclusion in Schedule 25 of IMO as a novel food was appropriate, a position NZFGC supports.