4 December 2017

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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 A1142: Addition of a prescribed method of analysis for resistant starch***

Yours sincerely

Katherine Rich

Call for submissions – Application A1142: Addition of a prescribed method of analysis for resistant starch

Submission by the New Zealand Food & Grocery Council

4 December 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 A1142: Addition of a prescribed method of analysis for resistant starch.***

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.

BACKGROUND

3. Resistant starches are starches that are wholly or partly indigestible in the small intestine because of their natural physical structure (such as in raw bananas, some maize starches) or changes to their structure as a result of cooking, cooling, storage or processing. Such starches generally have a positive effect on satiety. The application states that resistant starch "is a component naturally present in starchy foods consumed throughout the world, including cereals, corn, legumes, fruits and vegetables. When consumed, a portion of the starch (termed resistant starch) resists enzymatic digestion in the small intestine and enters the large intestine where it is partially or wholly fermented."

4. A method for analysing accurately the level of resistant starch in a food product is necessary to enable declaration in the nutrition information panel particularly if a claim is made about them.

5. The permitted methods of analysis in Schedule 11 of the *Australia New Zealand Food Standards Code* (the Food Standards Code) for dietary fibre (section S11—4) are all established as official methods of AOAC International, which is a globally recognised, independent association that develops consensus standards in the area of analytical chemistry. The current methods for analysing 'total dietary fibre' in the Code measure some, but not all, resistant starch in a food and the amount measured depends on the food matrix. The methods do not distinguish resistant starch from other forms of dietary fibre present in the food.

6. The Application by Ingredion seeks to amend the Food Standards Code to include the AOAC 2002.02 (Resistant starch in Starch and Plant Materials) as a method of analysis for resistant starch as a specifically named dietary fibre.

COMMENTS

7. NZFGC is pleased to see that FSANZ's assessment has concluded that AOAC 2002.02 is appropriate as a prescribed regulatory method for measuring resistant starch as a component of dietary fibre.

8. AOAC 2002.02 is recognised and widely used internationally, and is the only method for resistant starch in the Codex list of recommended methods. The method is applicable to samples containing between 1%–75% resistant starch and method performance parameters including limit of quantification, repeatability, and reproducibility are acceptable for food regulatory purposes.

9. NZFGC considers that providing a broad range of methods of analysis for components of food enhances the food system, supports innovation and ultimately provides greater transparency for consumers.

10. NZFGC is fully supportive of the proposed amendment to the Food Standards Code that will provide for the inclusion of AOAC 2002.02 (Resistant starch in Starch and Plant Materials) as a method of analysis for resistant starch as a specifically named dietary fibre.