



4 December 2017

Project Officer Application A1134  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

Dear Sir/Madam

**Application A1142 – Addition of a prescribed method of analysis for resistant starch – 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 agrees with FSANZ that resistant starch fulfils the definition of dietary fibre in the Australia New Zealand Food Standards Code and supports the proposal to add AOAC 2002.02 as a method of analysis for resistant starch. The addition of the method will provide an accurate and reliable analytical method for measuring resistant starch in foods. The addition of a specific method of analysis for resistant starch enables the declaration of resistant starch in the nutrition information panel. Furthermore, this information would be required if a general level health claim for resistant starch was made (if one was substantiated).

MPI notes that FSANZ concluded in determining that resistant starch fulfils the definition of dietary fibre that there is evidence that "*Replacement of digestible starch with resistant starch in a meal promotes modulation of blood glucose by reducing peak postprandial blood glucose concentration*". MPI is aware that FSANZ is currently considering the EU authorised claim about resistant starch and post-prandial blood glucose rise. MPI suggests that the Approval Report notes this and provides an update on the status on this work.

MPI notes that some of the appendices are missing from the Application by Ingredient on the FSANZ website, including the datasheet for Hi-Maize (noting that some appendices are commercial in confidence). The Approval Report could note that permission to add a dietary fibre is not necessarily provided by the method of analysis, as some forms of dietary fibre might be novel or nutritive and therefore require a premarket assessment by FSANZ. Others are simply ingredients requiring no premarket approval.

Roger Cook