



Kellogg Australia Pty Ltd  
41-51 Wentworth Avenue  
Pagewood NSW 2019

**Kellogg (Aust) Pty Ltd**

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

30<sup>th</sup> November, 2017

Contacts:

Robyn Hodge  
Nutrition Regulatory Manager

Food Standards Australia New Zealand

Via email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

30<sup>th</sup> November, 2017

Letter of support - **FSANZ A1142 – Addition of a prescribed method of analysis for resistant starch**

Kellogg (Aust) Pty Ltd welcomes the opportunity to respond to the call for the application to amend *Schedule 11* of the Australia New Zealand Food Standards Code (the Code) to include an analytical method for the determination of resistant starch as a specifically named fibre in food.

This support is based on the following considerations:

- Resistant starch satisfies the definition of dietary fibre, as defined in the Code.
- AOAC 2002.02 is a globally recognised method for the measurement of resistant starch. Being a globally recognised method also allows for global comparison and correlation of the resistant starch data of ingredients and/or foods.
- Inclusion of AOAC 2002.02 in the Code provides a recognised analytical method for the measurement of resistant starch which is not currently available in Australia.
- Recognised methodology for declaration of resistant starch in the NIP will ensure consistency within food industry as this will be the only defined method for the measurement of resistant starch if it is to be included in the total dietary fibre figure and/or declared as a sub-group of dietary fibre.
- If resistant starch is measured using this method and is to be included in the total dietary fibre figure, then adjustments must be made to ensure that there is no double counting of fibres, as per Schedule 11-4(3) of the Code. However, it must be noted that to determine an equation to account for double counting is not simple due to the fact that there are five different types of resistant starch, of which the amount of fibre captured in the standard dietary fibre method (AOAC 985.29) may vary significantly. A possible solution would be to declare resistant starch as a sub-group of insoluble fibre if declared in the Nutrition Information Panel (NIP).
- If all major sub-groups of dietary fibre are listed in the NIP, these being insoluble, soluble and resistant starch, then total dietary fibre content should be the sum of these sub-groups declared. This is based on the assumption that adjustments are made for double counting and soluble fibre is determined by difference.