



February 2008

**Submission from the Dietitians Association of Australia
Proposal P306 Addition of Inulin/FOS & GOS to Food**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 3400 members, and branches in each State and Territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

Contact person: Ms Annette Byron
Position: Policy Dietitian
Organisation: Dietitians Association of Australia
Address: 1/8 Phipps Close, Deakin ACT 2600
Telephone: 02 6163 5216
Facsimile: 02 6282 9888
Email: abyron@daa.asn.au

DAA appreciates the opportunity to provide general comment on the Proposal P306 Addition of Inulin/FOS & GOS to Food, and to respond to specific questions within the Proposal.

General comments

There is a history of safe use in the general food supply and the addition of inulin/FOS and GOS may provide benefit to adults as a source of dietary fibre. Based on the evidence provided in the supporting documentation, and at the levels designated in the proposal inulin/FOS and GOS appears safe for special purpose foods for infants and young children. However, the benefits of addition to products manufactured for infants and young children are difficult to assess given the limitations of the studies referred to in the documentation.

Consequently DAA has no objection to FSANZ's preferred regulatory approach for Proposal 306 as follows:

- Amend Standard 1.1.1 to state that inulin-derived substances and FOS are taken not to be nutritive substances;
- Amend standard 2.9.1 to permit the voluntary addition of inulin-derived substances to infant formula products up to a total maximum of 110mg/100kJ (0.3g/100mL), or GOS up to a total maximum or 290mg/100kJ (0.8g/100mL), or a combination of inulin-derived substances and GOS up to a total maximum of 290mg/100kJ (0.8g/100mL) where inulin-derived substances do not exceed 110mg/100kJ (0.3g/100mL); and

- Amend Standards 2.9.2 and 2.9.3 Division 4 to permit the voluntary addition of inulin-derived substances and GOS, alone or in combination, to infant foods and formulated supplementary foods for young children up to a total maximum of 0.8g/100g and 1.6g/serve (0.8g/100mL), respectively.

Response to specific questions

Question to submitters page 33: Should a warning statement be required in the label on a package of infant formula product, if inulin-derived substances and/or GOS have been voluntarily added? (If you believe that a warning statement is warranted, please provide any evidence to support this requirement).

DAA believes that a warning statement is not warranted given the conservative approach taken to the maximum amount permitted. Declaration of the inulin-derived substances and/or GOS on the ingredient label is sufficient.

Question to submitters page 33: Do you agree with the suggested approach (as included in the guidelines for Infant Formula Products) for declaring the presence of inulin-derived substances and/or GOS in the nutrition information statement? If you disagree, please describe what guidance should be provided on how this nutrition information is to be declared in the nutrition information statement.

DAA agrees with the suggested approach for declaring the presence of inulin-derived substances and/or GOS in the nutrition information statement.