



Standards Management Officer
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A1055 Application to permit the optional addition of short chain fructo-oligosaccharides (scFOS) to Infant Formula Products, Foods for Infants, & Formulated Supplementary Foods for Young Children

CODEX Standards

Dear Cathie

Thank you for the opportunity to provide additional information with regard to Section 3.3.1 International Regulatory Status of Short Chain Fructo-oligosaccharides in Foods (p77), with regards to the CODEX Standards. I would very much appreciate if you would please attach this letter as to the Application as an additional comment regarding this section.

As does the CODEX Standards (CODEX Stan 72-1891 (rev. 2007) Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants and CODEX Stan 156-1987 Standard for Follow-up Formula), CODEX Stan 074-1981, Rev. 1-2006 CODEX Standard for Processed Cereal-based foods for Infants and Young Children also includes a clause for the addition of "Optional Ingredients". The optional ingredients may be added on the basis they are suitable for use in the product, are scientifically shown to be efficacious and are present at sufficient levels to ensure the intended effects are achieved. The CODEX Standard for Canned Baby Foods (CODEX Stan 73-1981) states "Baby foods may be prepared from any suitable nutritive material that is recognized or commonly sold as an article or ingredient of food, including spices". CODEX provides a guideline document for Formulated Supplementary Foods for Older Infants and Young Children (CAC/GL-08-1991) which targets foods for use during the weaning period. Within that guideline there are no restrictions on the type of carbohydrates recommended for use, however the document does recommend the level of dietary fibres and other non-absorbable carbohydrates should not exceed 5g/ 100g.

On this basis the use of scFOS up to the maximum level proposed, would be viewed as permissible in a wide range of foods for infants and young children – including infant and follow-on formulae, formulated supplementary foods, processed cereal based foods and canned baby foods - in those countries defaulting to the CODEX standard.

Should you have any further questions regarding the Application, documentation or require any further detail, please direct them to me. Also, if you could please include me on any notification of progress and receipt of additional Application documents that would be very much appreciated.

With regards

Lynley N Drummond
Consultant