

1 February 2013

To whom it may concern,

Fonterra appreciates the opportunity to provide comments on the Application A1055, Short Chain Fructo-oligosaccharides.

Fonterra supports breast feeding as the preferred method of feeding an infant. If, however, breast feeding or breast milk is not available for the infant, the only suitable alternative method of feeding is an infant formula product.

Fonterra notes the consolidated conclusion provided in the Risk and Technical Assessment report – Application A1055, that “that scFOS produced by invertase-catalysed condensation of sucrose, scFOS_{sucrose} is technologically justified and is as safe as inulin derived substances (IDS) already permitted to be added to foods generally, and to infant formula products, infant foods and FSFYC alone or in combination with IDS and/or GOS up to the currently permitted maximum concentrations.”

The remaining issue for consideration was the safety of the use the processing aid invertase, as derived from *Aspergillus niger*, when processing the sucrose to produce scFOS_{sucrose}. The evidence presented confirmed in the assessment report found that the use of *A. niger* in the production of the invertase and the use of the invertase in the production of scFOS_{sucrose} raised no public health and safety issues.

Fonterra supports the approach to research and development that focuses upon the growth and development outcomes for infants and how these can be maintained and improved. This outcome-based approach has implications for the assessment of a wider range of food ingredients to be used in infant formula products, into the future.

Please do not hesitate to contact either of us should you require any further information.

Yours sincerely,

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Regulatory Manager, Paediatrics [Corporate]

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