



# Ingredion

**JANUARY 2017**

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

**IN RELATION TO:**

APPLICATION FOR ADDITION OF A PRESCRIBED METHOD  
OF ANALYSIS FOR THE DETERMINATION OF RESISTANT  
STARCH IN STANDARD 1.2.8 - NUTRITION INFORMATION  
REQUIREMENTS

## EXECUTIVE SUMMARY

(As per section 3.1.1 A.2 of the Application Handbook 1 March 2016)

The purpose of this Application is to request an amendment to the *Australia New Zealand Food Standards Code* (hereafter, the Code) to add a method for specifically named fibre content of food (resistant starch) to Schedule 11 – Calculation of values for nutrition information panel, clause S11-4 Methods of analysis for dietary fibre and other fibre content.

Ingredion requests the addition of AOAC Official Method 2002.02/AACC Approved Method 32-40 for resistant starch to S11-4.

Resistant starch (RS) is a component naturally present in starchy foods consumed throughout the world, including cereals, corn, legumes, fruits and vegetables. When consumed, a portion of the starch (termed resistant starch) resists enzymatic digestion in the small intestine and enters the large intestine where it is partially or wholly fermented (McCleary et al 2002; McCleary and Rossiter 2004).

Resistant starch has been officially defined as:

*“starch and the derivatives of starch that are not digested in the small intestines of healthy people”.* (Brown et al 2001).

Schedule 11-4 (S11-4) Methods of analysis for dietary fibre and other fibre content contains the prescribed methods for the determination of total dietary fibre and any specifically named fibre content for the purposes of nutrition information labelling in Standard 1.2.8. S11-4 currently does not include a prescribed method of analysis for resistant starch for the purpose of nutrition labelling.

Inclusion of this method is necessary for accurate analysis of resistant starch in food products to enable declaration in the nutrition information panel. The Applicant acknowledges that declaration is not mandatory, however where a nutrition content or general level claim is made about RS then a declaration is required in the nutrition information panel. A method is required that distinguishes resistant starch from other forms of dietary fibre present.

Resistant Starch is becoming a more recognised and important fibre component that food manufacturers are looking to incorporate in their products and to communicate to consumers about. With the health effects of resistant starch becoming increasingly known, it is beneficial to have resistant starch measured as a fibre and labelled on pack. It is expected that the interest in resistant starch will increasingly become more important and manufacturers will look to add ingredients with resistant starch into new products.

Where a nutrition content claim is being made about products for resistant starch (or any other nutrient) it is important that a consistent method of analysis is used to ensure consumers are comparing “like with like” when making purchase decisions.

AOAC 2002.02 is an approved method for resistant starch the USA; Canada and the UK/Europe.

The AOAC Official Method 2002.02 and AACC Method 32-40 has been described as a robust and reliable method that reflected in vivo conditions and yielded values that were physiologically significant (Landon et al 2012). This method is applicable to plant and starch materials containing resistant starch contents ranging from 3.0 to 64% on an “as is” basis. The method is suitable across a range of food matrices but less accurate at RS<1%.

To: Food Standards Australia New Zealand

In relation to: Application for addition of a prescribed method of analysis for the determination of resistant starch in Standard 1.2.8 - Nutrition Information Requirements