

17 January 2019

Project Officer Application A1155  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

Dear Sir/Madam

## **Application A1155 2'-FL and LNnT in infant formula and other products – Call for Submissions**

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

MPI has no concerns regarding the safety of the voluntary addition of 2'-FL alone or with LNnT to infant formula products and formulated supplementary foods for young children at the levels proposed by FSANZ noting that these are higher than requested by the applicant. The food technology and GM safety assessments are well detailed and provide confidence that 2'-FL and LNnT are structurally and chemically equivalent to the naturally occurring forms and present no public health risks.

MPI notes that FSANZ is proposing to permit 2'-FL and LNnT to be used as nutritive substances and that the permissions for 2'-FL and LNnT would be used as alternatives to existing permissions in the Food Standards Code for GOS and ITF. Would this necessitate GOS and ITF also to be considered to be nutritive substances?

### Labelling

MPI supports FSANZ's proposal to prescribe the ingredient names for declaration in the ingredient list to achieve uniform labelling of their presence in products. We note however that this does not prevent the use of different names for these ingredients elsewhere on the label of formulated supplementary foods for young children. We therefore suggest that further consideration is given to the need to prevent any reference to 'human milk' ingredients on the label of formulated supplementary foods for young children given that the prohibition for the use of such terminology on infant formula products does not extend to these products. MPI is aware of the use of front of pack claims internationally on both infant formula products and toddler milks on 'HMO' or 'Human milk oligosaccharides'.