

A1178 – Method AOAC 2017.16 as a new method of analysis for total dietary fibre

Comments from the Victorian Department of Health and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 22 June 2021

The Victorian Departments of Health and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application *A1178 – Method AOAC 2017.16 as a new method of analysis for total dietary fibre* seeks to permit a new, voluntary method of analysis for total dietary fibre (AOAC 2017.16).

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- Dietary fibre analysis is required to declare dietary fibre in the Nutrition Information Panel of a packaged food; and for determining F (fibre) points when assessing if a product meets Nutrient Profile Scoring Criteria and is thus eligible to make a health claim. These labelling requirements are to inform consumers' ability to make healthier food choices.
- No single method is recommended for the analysis of total dietary fibre. The proposed method detects both high and low molecular weight dietary fibre, including the non-digestible oligosaccharides galacto-oligosaccharides (GOS) and isomalto-oligosaccharides (IMO).
- GOS do not meet Food Standard Australia New Zealand's current definition of fibre and Food Standards Australia New Zealand has not assessed IMO against the dietary fibre criteria of the Code.
- The definitions of fibre permitted by the Code differ from international definitions, but this was considered out-of-scope by FSANZ in the assessment of this application, and;
- The Applicant claims that the costs to industry will be lower with the proposed AOAC 2017.16 method, compared with cumulative testing methods currently used.

It is recognised that this method is probably an advance on those currently available, but it is a concern that an overestimation of dietary fibre is more likely with this method of analysis.

FSANZ considers that the rate of naturally occurring GOS and IMOs in food available to Australian and New Zealand consumers is sufficiently low that the overestimate of dietary fibre in foods produced locally would not overly impact consumers' ability to make informed choices. However, imported foods often have GOS and IMO added, and these foods may contribute to a consumer overestimating the amount of fibre consumed. For some foods, the overestimation of fibre may also qualify the food for nutrient and health claims, misleading the consumer about the potential health qualities of the product.

The departments note that a full analysis of the dietary fibre component of a food requires both the food producer and the analyst to (1) have an understanding of the naturally occurring and added fibre components, and (2) select appropriate methods from those permitted in the Code. The concern remains that there is the potential for industry to 'method shop' to derive an inflated dietary fibre figure; particularly since AOAC 2017.16

A1178 – Method AOAC 2017.16 as a new method of analysis for total dietary fibre

is designed to detect dietary fibre content as defined in CODEX which differs from the definition in the Code. Further ambiguity is added in that the Code permits dietary fibre to be expressed per serving size, where serving sizes are not prescribed, and this leads to potentially misleading labelling for consumers.

On the basis of the information above, and despite FSANZ's conclusion that there are minimal public health and safety issues associated with Application *A1178 – Method AOAC 2017.16 as a new method of analysis for total dietary fibre*, the departments **do not agree** to the progression of this Application to amend the Code at this stage. The issues outlined above need to be considered prior to adopting a new method to ensure the provision of more accurate information to consumers regarding the healthfulness of food.