

27 May 2021



Food Standards Australia New Zealand (FSANZ)

submissions@foodstandards.gov.au

Dear FSANZ Officer,

Application A1178 - Method AOAC 2017.16 as a new method of analysis for total dietary fibre:

The Application proposes a change to Schedule 11 (S11—4) of the Australia New Zealand Food Standards Code (the Code), to permit the total dietary fibre content in a food to be determined in accordance with the AOAC method 2017.16 (Rapid Integrated Total Dietary Fibre Method) as an alternative to existing permitted methods.

The Healthy Grain P/L is strongly supportive of the proposal to approve AOAC 2017.16 as a method for measuring total dietary fibre in Australia.

The Healthy Grain P/L is an Australian SME commercialising BARLEYmax® a nutritionally superior barley wholegrain. The product is used in a wide range of food products, such as breakfast cereals, rice blends and breads; and these products are found in supermarket shelves in Australia, New Zealand, Japan, Taiwan and USA. More BARLEYmax containing product launches are anticipated in other countries, including Netherlands and UK. One of the key features of BARLEYmax wholegrain is its high level of dietary fibre.

Our understanding from reading about the method and using the method is that it better corresponds to the Codex Alimentarius definition of dietary fibre. The AOAC 2017.16 capturing certain dietary fibres that the older dietary fibre methods 'miss'. From a consumer perspective the AOAC 2017.16 seems likely to provide a better guide as to the amount of dietary fibre available to provide a health benefit.

The Australian consumer increasingly understands the importance of digestive health, and the importance of dietary fibre and prebiotics to digestive health. We know that these informed consumers are concerned about increasing their intake of dietary fibre and prebiotics and a 'more accurate' measure of dietary fibre would assist them in their target of healthier eating.

BARLEYmax is sold in several countries overseas and from our discussions overseas we know that AOAC 2017.16 is accepted in several such countries. It would be useful for the success of BARLEYmax overseas if there was harmonisation between Australia and overseas as to the acceptable dietary fibre methods. Such harmonisation would be more cost effective for an SME like The Healthy Grain, meaning that we would only need to test dietary fibre by one method and would need to produce only one set of documents for global use.

Yours sincerely

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