

Comments from Victorian Departments of Economic Development, Jobs, Transport and Resources, and Health and Human Services.

Due Date of Submission – 13 December 2016

The Victorian Departments of Economic Development, Jobs, Transport and Resources, and Health and Human Services (the departments) welcome the opportunity to provide comments on Application A1124 Alternative DHA-rich Algal Oil for Infant Formula Products.

Application A1124 seeks approval to permit the addition of DHA- rich algal oil from *Schizochytrium* sp. American Type Culture Collection (ATCC) PTA-9695 as an alternative or replacement oil for other currently permitted DHA-rich algal oils added to infant formula products.

From the FSANZ assessment report it is understood that:

- Schedule 25 of the Australia New Zealand Food Standards Code (the Code) permits several novel oils derived from marine micro-algae to be used as an optional ingredient in infant formula products.
- DHA-B is proposed to be added to infant formula products at levels consistent with the current uses of DHA oils and within the 1% maximum permitted level of omega- 3 long chain polyunsaturated fatty acids in Standard 2.9.1.
- The risk and technical assessment identifies no risk to infant health and safety in relation to the use of DHA-B oil as an alternative to other approved sources of DHA in infant formula products.
- The composition of DHA-B is nutritionally 'alike'; the main difference is the ratio of DHA to EPA.

The departments note the Application seeks to approve the addition of DHA-rich algal oil from *Schizochytrium* sp. American Type Culture Collection and is supportive of this amendment.

The departments note that the Application states 'the stability of DHA-B within a food matrix such as infant formula products is assured'. However product stability in powdered infant formula (the most common variety in Australia) has not been demonstrated. While we agree that the infant formula manufacturer is ultimately responsible for assuring the product is stable throughout its shelf life, it is our view that the Applicant should provide information on the stability in all types of infant formula (that is, powdered and liquid). Given the amended Standard will list this as a suitable alternative to other forms of DHA for infant formula, the Applicant should be able to show that DHA-B is fit for this purpose.

Subject to this final comment being addressed, the departments support the progression of the Application A1124.