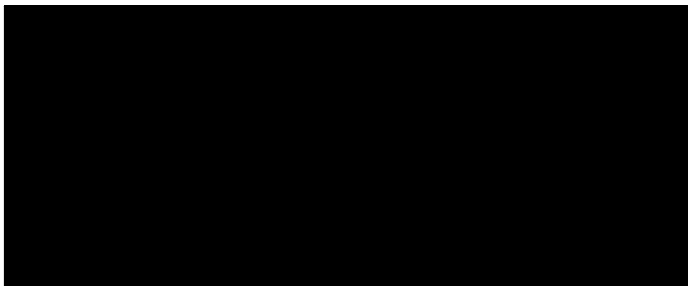




Kellogg (Aust) Pty Ltd

Submission: Review of A1178 – AOAC 2017.16 AS A NEW METHOD OF ANALYSIS FOR TOTAL DIETARY FIBRE

17<sup>TH</sup> June 2021





Kellogg (Aust) Pty Ltd welcomes the opportunity to provide comment on Food Standards Australia New Zealand's (FSANZ) call for submission on **A1178 AOAC 2017.16 AS A NEW METHOD OF ANALYSIS FOR TOTAL DIETARY FIBRE**

The purpose of the application by the Australian Grains and Legumes Nutrition Council (GLNC) is to amend the Australia New Zealand Food Standards Code (FSC) to include in schedule 11 section 4, the AOAC Method 2017.16 Rapid Integrated Total Dietary Fibre Method as a new method of analysis for measuring dietary fibre content in food and food ingredients.

Kellogg (Aust) Pty Ltd **supports** the application.

With regard to the three risk management options considered by FSANZ for this application, Kellogg (Aust) Pty Ltd **supports** **OPTION 3**, that is, to permit AOAC 2017.16 without restriction.

Currently, Kellogg regularly uses an external NATA certified laboratory to determine dietary fibre in our products using the following AOAC methods permitted in schedule 11 of the FSC

dietary fibre - section 985.29

dietary fibre (including all resistant maltodextrins)—section 2001.03;

for inulin—section 999.03;

for resistant starch—section 2002.02

Therefore, we would welcome the opportunity to have a single comprehensive method to measure all high and low molecular weight dietary fibres. Noting that Kellogg would only use this method when there is a presence of other fibres not captured in AOAC 985.29.

Kellogg also recognises other advantages for this method to include

1. Harmonization with Codex and other jurisdictions that are already using this newer method of fibre analysis.
2. Encourage innovation to include new fibre ingredients knowing that increased fibre can confidently & accurately be declared in the nutrient information panel.

3. Provide consumers with more accurate fibre declarations in the NIP which will transpire to consumers being able to make informed choice when selecting food choices based on fibre content.
4. The use of fibre method remains voluntary and manufacturers can select the most appropriate method for fibre analysis based on the composition of their food ingredient or food.

Addressing the potential issue raised that, the method may over estimate galacto-oligosaccharides (GOS) and isomalto—oligosaccharides (IMO), Kellogg note that's we do not currently add these non-digestible fibre ingredients to any products in our breakfast cereal or snacks portfolio. We support FSANZ position that the low levels of GOS, and even lower levels of IMO in the food supply will not considerably alter food composition data, NIP's or F points scores for NPSC or HSR.

Finally, in response to Question 1 in the Call for submission document - Kellogg (Australia) has no dietary fibre values declared on any products in our portfolio that have been determined using AOAC 997.08

**In conclusion, Kellogg (Aust) Pty Ltd supports**

- 1. Section 11-4 of the FSC be amended to include AOAC 2017.16 as a method for analysis of total dietary fibre and**
- 2. Option 3 permission of AOAC 2017.16 without restriction**



Date: 17<sup>th</sup> June 2021

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