



Nestlé Submission
Application A1214 – Nicotinamide riboside as
Vitamin B3 in FSMP May 2021

This submission is made on behalf of Nestlé Australia Ltd. and Nestlé New Zealand Limited.

Nestlé is a manufacturer and importer of a wide variety of foods for the Australian and New Zealand markets and is globally one of the largest manufacturers of food.

Nestlé welcomes the opportunity to provide comments in response to the Call for submission for – Application A1214 – Nicotinamide riboside chloride as Vitamin B3 in FSMP.

Nestlé supports this application to amend the Australia New Zealand Food Standards Code to permit the use of nicotinamide riboside chloride (NR) as a new form of vitamin B3 in food for special medical purposes (FSMPs) that partially or totally replace the daily diet. With NR's existing GRAS status in the US and approval in the EU as a novel food and with most FSMP products being imported from the US and EU, it is anticipated that this application will support importation of these FSMPs into Australia and New Zealand and remove barriers to the supply providing access to these important FSMPs products..

As FSMPs face unique compositional permissions compared to other foods, being designed specifically to assist in the dietary management of a medical outcome and intended to be consumed under specialised medical supervision, Nestlé considers that this application will facilitate innovation into future FSMP formulations. With evidence to suggest that the use of NR in FSMPs has a particularly strong potential as a method of delivering/increasing the anabolism of NAD+ to support human wellness during metabolic stress and aging, this may be a benefit to the vulnerable target group

Although FSMPs are foods designed for a particular vulnerable target group, safety of use is of priority, however this is an area of medical nutrition which is growing and innovating very rapidly to provide medical nutrition options to the target group of consumers, focusing on their medical needs. The role of nutrition has changed the course of health and disease management in the past years with nutritional therapies working synergistically with medical treatments in the management of diseases and disorders.

Nestlé fully supports the draft variation of the Code with an amendment to the table to section S19-20 to include nicotinamide riboside chloride in the list of permitted forms of niacin in FSMPs and amendments to Schedule 3 to include a specification for nicotinamide riboside chloride. We thank FSANZ for their assessment and conclusion that there are no safety concerns associated with the use of nicotinamide riboside chloride as a form of niacin in FSMPs.