

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

P O BOX 4107,
FRANKSTON HEIGHTS,
VIC 3199
TEL/FAX: 03 5971 5817
EMAIL: fta@ftaus.com.au

SUBMISSION

Attention: **Project Manager – Application A1055**

10 February 2012

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Short Chain Fructo-Oligosaccharides – Call for Submissions

FTA Australia has reviewed this [Application](#) and endorses the following comments of the Technical Sub Committee:

The Committee agreed with Option 1 to:

- (a) – to prepare a draft variation to amend Standards 2.9.1, 2.92 and 2.9.3 to permit the optional addition of short chain FOS_{sucrose} to infant formula products, infant foods and FSFYC respectively, up to the same maximum amounts as currently permitted for IDS and GOS;
- (b) – to prepare a draft variation to Standard 1.3.3 – Processing Aids to permit the use of Invertase (EC 3.2.1.26) prepared from a strain of the fungus *A. niger*.

The Committee also made the following comments:

1. Is short chain FOS_{sucrose} subject to any patents or patents pending and if so it is strongly suggested that FSANZ include an Editorial Note to that effect?
2. Will short chain FOS_{sucrose} be subject to any special labeling requirements? There is a possible customer need to know. Also some infant products are currently labeled with expressions such as “long chain poly-fructose” etc and obviously short chain FOS_{sucrose} are different and should they be distinguished in labeling if used?
3. As short chain FOS_{sucrose} is based on an enzyme derive from Soy, then any use of short chain FOS_{sucrose} will require a Mandatory Warning Statement as per Standard 1.2.3 Clause 4 re presence of an allergen.

[REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Application](#).

Yours sincerely,

[REDACTED]
PRESIDENT – FTA AUSTRALIA