



13 December 2016

Project Officer Application 1124
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

Dear Sir/Madam

Application A1124 Alternate DHA-rich Algal Oil for Infant Formula Products

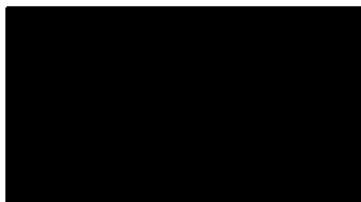
Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

MPI supports the application; that is to approve an alternative source of DHA for addition to infant formula products. The new source is abbreviated as DHA-B.

We also note the following points, which might be able to be addressed in the Approval Report:

- As DHA-B is proposed for permission in infant formula products only (whereas other DHA sources are permitted in all foods), it would be helpful if the Approval Report could explain the reasoning for the limited use – i.e. is this because the Applicant requested this use, or is there another reason?
- Users of the Food Standards Code (the Code) may not find the permissions for DHA in food generally, and infant formula products in particular, easy to understand. To provide guidance to readers, MPI suggests that section 1.3.1 of the Approval Report is expanded to more clearly explain the following information:
 - Not all sources of DHA oils are regulated as novel foods. The non-novel source (oil derived from the algae of *Cryptothecodinium cohnii* rich in DHA) is listed in S3—19, with no other references in the Code.
 - Up until A1124, all sources of DHA (novel and non-novel) could be added to all foods (including infant formula products), whereas the source that is under consideration in A1124 (DHA-B) is proposed to be permitted in infant formula products only.

Yours sincerely



Jenny Reid
Manager Food Science and Risk Assessment