

AFGC SUBMISSION

A1178 – AOAC 2017.16 AS A NEW METHOD OF ANALYSIS FOR TOTAL DIETARY FIBRE

16 June 2021

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry. The membership of AFGC comprises more than 180 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Composition of industry turnover (2016-17)



With an annual turnover in the 2016-17 financial year of \$131.3 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Manufacturing of food, beverages and groceries in the fast-moving consumer goods sector is Australia's largest manufacturing industry, representing 36 per cent of total manufacturing turnover in Australia.

The diverse and sustainable industry is made up of over 36,086 businesses and accounts for over \$72.5 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2016-17 on research and development.

The food and grocery manufacturing sector employs more than 324,450 Australians, representing almost 40 per cent of total manufacturing employment in Australia. Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 42 per cent of the total persons employed being in rural and regional Australia. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

OVERVIEW

The Australian Food and Grocery Council (AFGC) welcomes this opportunity to comment on Food Standards Australia New Zealand's (FSANZ) *Call for submissions – A1178 – AOAC 2017.16 as a new method of analysis for total dietary fibre*.

The AFGC understands that FSANZ has assessed an application made by the Grains and Legumes Nutrition Council (GLNC) to permit a new voluntary method of analysis for total dietary fibre (AOAC 2017.16), and has prepared a draft food regulatory measure.

The AFGC has reviewed FSANZ's assessment with three risk management options and supports **Option 3: Permit AOAC 2017.16 without restriction**. We support change to section S11—4 to permit AOAC 2017.16 as a new voluntary method of analysis to determine total dietary fibre in food, without restrictions.

GENERAL COMMENTS

The AFGC supports the application by GLNC to permit a new voluntary method of analysis for total dietary fibre (AOAC 2017.16) which detects non-digestible oligosaccharides, galacto-oligosaccharides (GOS) and isomalto-oligosaccharides (IMO).

It will encourage innovation in the food industry to measure total dietary fibre by a single more comprehensive method. As the permission is voluntary, industry will therefore select the method of analysis that results in a more consistent and reliable dietary fibre result. As the new comprehensive method is more widely adopted it will assist consumers to make more valid between food product comparisons of dietary fibre content.

As FSANZ states on page 4 of the Call for Submission report:

“At present there is no single method of analysis that can comprehensively measure all low and high molecular weight dietary fibre. AOAC 2017.16 is the most comprehensive method FSANZ has assessed to date.”

The AFGC notes that FSANZ assessed any potential overestimation of total dietary fibre of GOS-containing foods analysed using AOAC 2017. FSANZ estimated that naturally-occurring GOS could increase total dietary fibre values in plant foods on average by 0.85 g/100g, and in dairy products by up to 0.6 g/100 g.

The AFGC supports FSANZ conclusion that

“The low levels of GOS in the food supply would not considerably alter food composition data, NIPs for dietary fibre or F point scores for the NPSC, therefore it is likely consumers will still be provided with sufficient information to enable informed choices on dietary fibre in food products. IMO has not been assessed against the definition of dietary fibre, but as IMO is less prevalent than GOS the above can be inferred for IMO.”

SPECIFIC COMMENTS

DEFINITION OF DIETARY FIBRE AND HARMONISATION

The AFGC understands that regulatory definitions and methods of dietary fibre analysis vary around the globe. Therefore, the AFGC supports **Option 3** to adopt AOAC 2017.6 to improve harmonisation of dietary fibre analysis, and thus future trade opportunities, noting that Codex in 2019 AOAC 2017.16 was referred to the in Codex Committee on Methods of Analysis and Sampling. Other regions and countries such as the EU, US and Canada are aligning with AOAC 2017.16 as a voluntary method of fibre analyses.

The AFGC supports the current definition of dietary fibre in the Food Standards code Standard 1.1.2 and supports section S11-4 to be amended to include AOAC 2017.16 as a method of analysis for total dietary fibre.

Option 2 is not supported by the AFGC as it means that only some products would be permitted to use AOAC 2017.16 and therefore increases the complexity of the regulatory environment. In the instance that option 2 were adopted, it would mean that products containing GOS and IMO would not be permitted to use AOAC 2017.16.

The AFGC notes that:

“AOAC 2009.01 is the predecessor method to AOAC 2017.16. Although AOAC 2009.01 is not permitted in the Code, it is currently accepted as a method of analysis for total dietary fibre by Codex and countries comparable to Australia and New Zealand such as Canada, the United States and European Union. However, Codex is currently considering replacing AOAC 2009.01 with AOAC 2017.16.”

ISOMALTO-OLIGOSACCHARIDES A DIETARY FIBRE

The AFGC notes that IMO were identified as non-digestible oligosaccharides (NDO) measured as dietary fibre by AOAC 2017.16. IMO are found in a range of foods in the Australian New Zealand food supply such as fermented foods and is permitted as novel foods as an alternative sweetener and bulk fibre, but it is not as widespread as GOS.

The AFGC supports FSANZ position that any risk management approach for GOS be applied to IMO as it notes that foods naturally containing IMO or containing added synthetic analogues of IMO are unlikely to use AOAC 2017.16 methods unless they contain complex mixtures of low molecular weight dietary fibre (LMWDF) and high molecular weight dietary fibre (HMWDF). Therefore, it is unlikely that the measurement of IMO will cause a significant overestimate of fibre in the food supply.

QUESTION: 1. ARE THERE ANY DIETARY FIBRE VALUES CURRENTLY DECLARED ON FOOD LABELS THAT HAVE BEEN DETERMINED BY AOAC 997.08 PRIOR TO 2013 USING THE TWO ENZYME SOLUTION?

The AFGC is unable to provide an answer as it is unaware of any dietary fibre values declared on food labels that have been determined by AOAC 997.08.

CONCLUSION

The AFGC supports FSANZ's CURRENT definition of dietary fibre in the Food Standards code Standard 1.1.2 and supports section S11-4 to be amended to include AOAC 2017.16 as a method of analysis for total dietary fibre.

RECOMMENDATION:

The Australian Food and Grocery Council supports option 3: Permit AOAC 2017.16 without restriction.

The AFGC supports changes to section S11—4 to permit AOAC 2017.16 as a new voluntary method of analysis to determine total dietary fibre in food, without restrictions.

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