

Submission to: **Food Standards Australia New Zealand**

In response to:

Call for Submissions – Proposal P1178

AOAC 2017.16 as a new method of analysis for total
dietary fibre

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Executive Summary

Introduction

Sanitarium Health Food Company, previously Sanitarium Health and Wellbeing, began in 1898 with the vision to help people 'learn to stay well'. Our mission is to **'inspire and resource our community to experience happy, healthy lives'**. We have been committed to this philosophy for over 100 years and it is the reason we exist today. Sanitarium also believes that good business is based on trust, respect and community involvement.

Sanitarium has a strong history of educating the community about healthy eating and healthy lifestyles. All of Sanitarium's activities have twin goals in mind - to provide healthy foods that actively improve our community's health and well-being, and to offer easy-to-understand nutrition information and practical health advice.

Sanitarium Australia and Sanitarium New Zealand are owned and operated by Australian Health & Nutrition Association Limited and New Zealand Health Association respectively. We produce over 150 products and employ over 1000 people in our manufacturing and distribution sites throughout Australia and New Zealand.

Sanitarium welcomes the opportunity to comment on the development and evolution of the Australia & New Zealand Food Standards Code. We believe we can provide a unique perspective and give valuable suggestions into the food policy and standards development in Australia and New Zealand.

Information contained in this submission has been drawn from the experiences of Sanitarium, and contains no commercial-in-confidence material – unless otherwise highlighted.

Discussion

Sanitarium appreciates the opportunity to make this submission to FSANZ in response to the call for submissions on Proposal A1178 – AOAC 2017.16 as a new method of analysis for total dietary fibre.

Sanitarium supports the application by GLNC to permit a new voluntary method of analysis for total dietary fibre (AOAC 2017.16).

Sanitarium supports **Option 3: Permit AOAC 2017.16 without restriction**. We support the change to S11—4 to permit AOAC 2017.16 as a new voluntary method of analysis to determine total dietary fibre in food, without restrictions. This change will equip food manufacturers with another tool for fibre analysis, one that is cost effective, comprehensive and similar precision level to other approved methods.

In relation to **Question 1**, Sanitarium does not currently use AOAC 997.08 to determine dietary fibre values on food labels and does not have any labels in market with fibre values determined by this method.