

Project Officer Application A1214
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

20 May 2021

Tēnā koe,

Application A1214 – Nicotinamide riboside chloride as Vitamin B3 in FSMP

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make:

NZFS supports an amendment to the table to section S29—20 of the Australia New Zealand Food Standards Code (the Code) to include nicotinamide riboside chloride (NRC) in the list of permitted forms of niacin that may be added to food for special medical purposes (FSMPs); and amending Schedule 3 to include a specification for NRC. This variation would permit the use of nicotinamide riboside chloride as a form of niacin in FSMPs in accordance with the Code.

The variation to the Code does not include any amendment to the existing mandatory compositional, labelling or other requirements for FSMPs as the application is to include a new form of an already permitted vitamin.

The clarification note, *'Application A1214 – Nicotinamide riboside chloride as Vitamin B3 in FSMP, Additional information for JTF members'*, provided valuable additional information. Further explanation from FSANZ regarding equivalence factors clarified that overall, they are confident NRC is a bioavailable form of niacin. NRC breaks down to provide known amounts of nicotinamide, and it is important to consider NRC intakes relative to RDIs for niacin equivalent to nicotinamide (1:1). We suggest that this is communicated either in the approval report, or via relevant guidance material.

We note that the risk assessment concludes there is no evidence of a public health and safety concern associated with the use of NRC as a permitted form of niacin in FSMPs within recommended intake levels of niacin. This is further supported by the existing risk management strategies incorporated in Standard 2.9.5 including the intended use under medical supervision and restrictions relating to access and sale.

Nāku noa, nā

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New Zealand Food Safety – Haumarū Kai Aotearoa

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