

Saclay, 16 August 2011

Mr Basil Mathioudakis
Head of Unit
DG SANCO-Directorate E-Unit 4
Rue Froissart 101,
1040 Brussels

Subject: Scientific opinion on the substantiation of a health claim related to “slowly digestible starch in starch-containing foods” and “reduction of post-prandial glycaemic responses” pursuant to Article 13.5 of the Regulation (EC) N°1924/2006, submitted by Kraft Foods Europe to the Competent Authority of Belgium (Claim serial N°: 0284_BE).

Dear Mr Basil Mathioudakis,

We would like to thank the EFSA for assessing the scientific evidence to substantiate the Article 13.5 health claim related to “slowly digestible starch” and “reduction of post-prandial glycaemic responses” and for requesting additional information when necessary during validation. Pursuant to Article 16(6) of Regulation (EC) N° 1924/2006, please find below our comments.

We were very pleased to receive a positive opinion and that the four proprietary studies for which we requested the protection of data are recognized. The proprietary studies consistently demonstrate the claimed effect and are essential to establish the conditions of use of this health claim.

In its opinion, the NDA Panel concluded that:

- the food constituent namely “slowly digestible starch” as defined in applying an appropriate method (such as the method developed by Englyst et al. (1996; 1999)), which is the subject of the health claim, and the comparator food constituent, “RDS” are sufficiently characterized in relation with the claimed effect.
- a cause and effect health relationship has been established between the consumption of “SDS”, as compared to the consumption of “RDS”, in cereal products and reduced post-prandial glycaemic responses (without disproportionately increased post-prandial insulinaemic responses).
- in order to bear the claim, cereal products should contain at least 55% of available carbohydrates as starch of which at least 40% should be “slowly digestible starch”.

Based on these conclusions, the Panel proposed the following wording reflecting the scientific evidence:

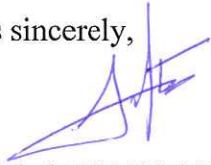
“Consumption of cereal products high in slowly digestible starch raises blood glucose concentration less after a meal than cereal products low in slowly digestible starch”.

We would like to take this opportunity to share with you our concerns regarding the conditions of use and the proposed wording:

1. In paragraph 3 of the opinion titled “Scientific substantiation of the claimed effect”, EFSA described the “SDS” content of the cereal products in percentage of “digestible starch”. Consequently, when the panel refers to “starch” in the conditions of use, we understand “digestible starch” (starch minus resistant starch) and we suggest that the Commission specify “digestible starch” in the conditions of use of the claim.
2. While the wording accurately reflects all the technical details of the scientific evidence, it may be difficult for the average consumer to fully perceive the favourable aspects of the food constituent. In an attempt to clarify, we suggest to the Commission:
 - to add the following to better explain to the average consumer that the effect is beneficial for him or her: *”which contributes to a healthy blood glucose”*.
 - to detail how the food constituent leads to the claimed effect, as “slowly digestible starch”, which is the subject of the health claim, is a new expression for the average consumer.

Kraft Foods Europe – Biscuits R&D is grateful for the time spent on this scientific dossier and is looking forward to further discussing these points with the Commission.

Yours sincerely,



Dr Michel INFANTES
Director of Research and Nutrition
Kraft Foods Europe – Biscuits R&D