

Healy Group Ireland Ltd.  
HCL House, Second Avenue,  
Cookstown, Tallaght,  
Dublin 24

June 1<sup>st</sup>, 2010

Dear Sir,

I am contacting you in regard to the application for a substantial equivalence opinion under *Article 5* of the novel food Regulation EC No. 258/97. The proposal is to use Baobab dried fruit pulp powder as an ingredient in a range of food products based on its substantial equivalence to Baobab dried fruit pulp already authorised as a novel food ingredient in the EU by Commission Decision 2008/575/EC.

Based on the information provided, the Food Safety Authority of Ireland (FSAI) is of the opinion that Baobab dried fruit pulp powder produced by Healy Food Ingredients is substantially equivalent to the EU- authorised Baobab dried fruit pulp in terms of its composition, nutritional value, metabolism, intended use and level of undesirable substances. This opinion is based on the fact that the same plant (Baobab, *Adansonia digitata*), grown in the same country (Senegal), undergoes the same process as that of the authorised product. For this reason, differences in composition, nutritional value, metabolism and levels of undesirable substances are not expected. While some minor compositional variations have been noted, these have been attributed to possible environmental difference, such as climate and the geography of the region, but could also be due to natural variation that occurs within the plant species. The original applicant (Phyto Trade Africa) requested permission to use this novel ingredient in smoothie drinks and cereal bars, however the Commission Decision authorising Baobab fruit pulp (2008/575/EC) does not stipulate restricted use of this novel ingredient in food. Healy Food Ingredients propose to use Baobab dried fruit pulp in smoothie drinks and cereal bars, but they also intend to use this novel ingredient in additional food products.

If you are satisfied with this opinion, you should notify the European Commission, in accordance with *Article 5* of Regulation EC No. 258/97, before you place this product on the market. In order to avoid any confusion, I recommend that you await a response from the Commission prior to placing the product on the market.

Commission contact details:

Mr Andreas Klepsch  
European Commission  
DG SANCO  
Rue de la Loi 200  
B-1049, Brussels  
Belgium

Regards,

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Dr. Ciara Walsh  
*Technical Executive, Biotechnology*