

31 August 2018

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions: Application A1129 Monk Fruit Extract as a Food Additive.***

Yours sincerely

Katherine Rich
Chief Executive



***Call for submissions – Application A1129
Monk Fruit Extract as a Food Additive***

**Submission by the New Zealand Food & Grocery
Council**

31 August 2018

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions: Application A1129 Monk Fruit Extract as a Food Additive.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

The Application

3. Saraya Co Ltd, Japan, has applied to have Schedule 15 of the Australia New Zealand Food Standards Code (the Food Standards Code) amended to add monk fruit extract (also known as *luo han gao* extract) as a food additive. Saraya has been making the extract for over two decades as an intense sweetener for use in the food supply.

COMMENTS

4. Overall, NZFGC supports this application and the proposed amendment to the Food Standards Code but it is important that the approved use extends to beverages.
5. Beverages have been particularly singled out for sugar content and to omit extending the permission for monk fruit extract as an alternative would be a grave omission.

Background

6. Monk fruit extract is currently permitted as a food additive in the Food Standards Code for flavouring purposes. It is available in both Australia and New Zealand from specialty retail outlets eg [https://www.iherb.com/search?kw=monk fruit](https://www.iherb.com/search?kw=monk+fruit) where it is sold as a sweetener. It is also promoted for diabetics and others for sugar reduction purposes.
7. Monk fruit extract is approved for use as a sweetener in several jurisdictions (US, Canada, Japan, China) although restricted to table top sweeteners in Canada.

Context

8. Manufacturers are constantly being asked to reduce sugar in products. Sugar reduction has been a feature of the New Zealand industry for many years often in conjunction with the Heart Foundation. Although sugar plays important technological functions in some foods, substitution is a prospect that has already been taken up especially in beverages.
9. Providing approved alternatives is, in this case, considered an important public health role of FSANZ.

Current Application

10. FSANZ has assessed monk fruit extract for its proposed use as an intense sweetener and has concluded that there are no public health and safety issues associated with this proposed use. This is based on:
 - level degradation the intestinal lumen
 - non-genotoxicity
 - no chronic toxicity or carcinogenicity

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- no adverse clinical or reproductive effects
 - the fact that the fruit is a traditional food and folk medicine in China and the extract having a long history of use in Japan and
 - no adverse effects having been attributed to monk fruit in any country where it is used.

11. NZFGC agrees with the proposal that an ADI for monk fruit extract of 'not specified' is appropriate. NZFGC also agrees with the specification of monk fruit extract through reliance on the US Pharmacopeial Convention (2016) Food Chemicals Codex (10th Edition)

12. NZFGC also agrees with the nomenclature being used of 'monk fruit extract' and notes that if an INS number is allocated in the future, this will be added to the Food Standards Code.

Extension to Beverages

13. As noted above, there is strong pressure in New Zealand to reduce obesity levels and to particularly reduce sugar in the food supply. The strongest pressure has been on the beverages sector to reduce sugar in sugar sweetened beverages. The alternatives or substitutes for sugar are limited.

14. Any addition to the options for alternatives to sugar that manufacturers might use are invaluable. NZFGC strongly supports an extension of the approval to beverages for reasons of

- Public health – providing another non-sugar sweetener for use in beverages to assist in addressing consumer demands for non-sugar sweetened drinks
- Use in other countries/markets where New Zealand trades to maintain competitiveness
- Remove impediments to the non-alcoholic beverage class to innovate (as has been the case with A1149, steviol glycosides)
- Remove duplicative resource use for both Government and industry in otherwise applying for and assessing monk fruit extract for use in beverages in the future
- Delivering a broader range of options in non-sugar sweetened beverages for consumers in New Zealand, Australia and export markets.

Conclusion

15. In conclusion, NZFGC supports this application and the proposed amendment to the Food Standards Code but it is important that the approved use extends to beverages.

16. Beverages have been particularly singled out for sugar content and to omit extending the permission for monk fruit extract as an alternative would be a grave omission and potentially an abrogation of FSANZ's role in relation to public health.