31 August 2018

Project Manager
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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 A 1157 Enzymatic Production of Rebaudioside M***.

Yours sincerely

Katherine Rich
Chief Executive

Call for submissions – Application A1157 Enzymatic Production of Rebaudioside M

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 A 1157 Enzymatic Production of Rebaudioside M*.**

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. Blue California has applied for a non-traditional production method for a specific form of an intense sweetener food additive in the group of steviol glycosides. This would require amendment to Schedule 3 of the Australia New Zealand Food Standards Code (the Food Standards Code). The amendment would include a reference to the enzymatic conversion of stevia leaf extract to produce Reb M using protein engineered enzymes.

4. Blue California is an R&D company and manufacturer of natural ingredient for use in a range of foods, beverages dietary supplements, cosmetics and health products.

COMMENTS

5. Overall, NZFGC supports this application and the proposed amendments to the Food Standards Code.

6. Intense sweeteners are increasing in use and assist the food and beverages industry to deliver healthful products to the market.

Background

7. Steviol glycosides are widely approved around the globe for use in food and beverages including the EU, US, Canada, Asia, Central and South America, and Africa.

8. JECFA (the FAO/WHO Joint Expert Committee on Food Additives) recently re-evaluated the safety, dietary intake and specifications for steviol glycosides (2016). The safety of steviol glycosides and the Acceptable Daily Intake (ADI) were confirmed and specifications restated.

Context

9. 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.

10. Providing approved alternatives is, in this case, considered an important public health role of FSANZ.

Current Application

11. FSANZ has assessed this non-traditional production method for a specific form of an intense sweetener food additive in the group of steviol glycosides 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:

- recent assessments particularly by JECFA, Canada and FSANZ itself (in a recent application from industry for steviol glycosides to be extended for use in beverages, A1149)
- no new information concerning genotoxicity
- non use of allergens in the yeast culture or at any other stage of production
- the source organism has a long history of industrial use and
- sufficient information attest to non-allergenicity and non toxicity.

12. The unique production method uses GM yeast to produce 3 enzymes that perform a technological function to convert pure stevia to the Reb M product. The enzymes are GM processing aids and do not remain in the final product. However, FSANZ risk management decision is that there could be a very remote prospect of a miniscule amount of the GM enzymes remaining in the sweetener which in turn is used in very small amounts in the food or beverage. The use is dictated by regulatory limits and sweetener intensity which is very high. On this basis, FSANZ proposes amending Schedule 18 to permit the GM enzymes in the food system.

13. No labelling of Reb M as to production method is required. NZFGC strongly supports this approach.

Use in New Zealand

14. As noted above, there is strong pressure in New Zealand to reduce obesity levels and to particularly reduce sugar in the food and beverage supply. The alternatives or substitutes for sugar are limited.

15. Any addition to the options for alternatives to sugar that manufacturers might use are invaluable.

Conclusion

16. In conclusion, NZFGC supports this application and the proposed amendment to the Food Standards Code including the risk management decisions proposed.