

6 November 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 A1149: Addition of steviol glycosides to fruit drinks.***

Yours sincerely

Katherine Rich
Chief Executive



***Call for submissions – Application A1149:
Addition of steviol glycosides to fruit
drinks***

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

6 November 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 A1149: Addition of steviol glycosides to fruit drinks.***
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. The Australian Beverages Council Ltd, supported by the New Zealand Beverage Council, applied to have the Australia New Zealand Food Standards Code (the Food Standards Code) amended in June 2017 to permit the addition of steviol glycosides to fruit drinks at a maximum level of 200mg/kg steviol equivalents. Steviol glycosides are intense sweeteners already permitted widely in the Australian and New Zealand food supply and in many countries/regions internationally.

COMMENTS

4. NZFGC strongly supports the amendment being sought for the addition of steviol glycosides to fruit drinks. In light of the intensified focus on obesity in both Australia and New Zealand, substitutes for sugar, where technologically justified and feasible for use in food or beverages in the food supply, should be vigorously pursued.
5. NZFGC understands that one of the delays to progressing this application was the potential for the acceptable daily intake (ADI) for steviol glycosides of 0-4 mg/kg bw to be exceeded. The omission of fruit drinks from permissions in the Food Standards Code to use steviol glycosides was somewhat anomalous and has been generally attributed to an oversight situation rather than a deliberate exclusion at the time.
6. The safety considerations delivered by ADIs are purposely conservative and the review of the exposure to the ADI for this application required Food Standards Australia New Zealand (FSANZ) to assess the extent of use in the food supply and the extent of consumption in various population groups. As noted in the *Supporting Document 1* to the FSANZ *Call for Submissions*, NZFGC assisted in facilitating the provision of data from industry concerning use and levels right across the food supply. This was in order for the FSANZ risk assessment to be completed.
7. Steviol glycosides are intense sweeteners already permitted widely in the food supply and in many countries/regions internationally. Steviol glycosides are derived from the *Stevia rebaudiana* plant and are 250-300 times sweeter than sucrose. They were first approved for use in the Food Standards Code, in a wide variety of foods, in 2008. Steviol glycosides have been reviewed by FSANZ four more times since then to make further amendments to the Food Standards Code, the last two to take account of different production methods. FSANZ’s food technology assessment concluded that steviol glycosides are widely used by industry, widely tolerated by consumers, stable and technologically justified.

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8. The hazard assessment followed the several other hazard assessments conducted for steviol glycosides. After reconsidering the toxicological data and related toxicity studies and reviewing the assessments by a selection of other reputable agencies, FSANZ concluded that there were no concerns raised regarding the safety of steviol glycosides.
 9. As noted above, the dietary exposure assessment (the population exposure to steviol glycosides) required updating to take into account potential changes in the food supply and consumer attitudes that might have occurred since the 2008 dietary exposure assessment for steviol glycosides was conducted. For Application A1149, both a baseline and refined assessment was conducted, the baseline assuming maximum levels in all approved foods was used and the refined assessment drew on a mix of current usage levels and maximum levels. Water-based beverages were the highest contributors to exposure of children 2-14 years and tabletop sweeteners were highest for New Zealand adults over 15 years. Even so, the exposures were below the ADI.
 10. FSANZ concluded that there were no public health and safety concerns from the extension of the use of steviol glycosides in fruit drinks at the proposed level.
 11. Steviol glycosides have been approved for use in a wide range of foods including fruit drinks, in the EU, Canada, USA, eight countries in Asia, seven countries in central and South America, India, Africa, Israel, Russia and Switzerland.
 12. In terms of risk management, steviol glycosides must be included in the ingredient listing but no other labelling is required.
 13. As noted at the outset, NZFGC supports the application and considers the inclusion of steviol glycosides as a permitted addition to water-based drinks will result in greater options for both consumers and industry in the sweetener used in such drinks going forward.