10 May 2019

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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 A1170 – Rebaudioside MD as a steviol glycoside from*** **Saccharomyces cerevisiae.**

Yours sincerely

Katherine Rich
Chief Executive

Call for submissions – Application A1170 – Rebaudioside MD as a steviol glycoside from Saccharomyces cerevisiae

Submission by the New Zealand Food & Grocery Council

10 May 2019

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the ***Call for Submissions – Application A1170 – Rebaudioside MD as a steviol glycoside from*** **Saccharomyces cerevisiae**.

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. Cargill International has applied to have a new specification for a purified steviol glycloside mixture of rebaudiosides M and D (Reb MD) added to the Australia New Zealand Food Standards Code (the Food Standards Code). Reb MD is produced from a genetically modified *Saccharomyces cerevisiae* strain. Steviol glycosides are used as intense sweeteners in a range of foods and beverages and Reb MD would add to the range available to manufacturers, marketed as 'Eversweet', by adding an improved sensory profile and therefore, better sweetness quality for consumers.

COMMENTS

4. NZFGC supports the application for amendment to the Food Standards Code to add the specifications for identity and purity for the production of Reb MD by a genetically modified yeast via fermentation. Specifications for Reb M are already contained in the Code but not produced by the method proposed by Cargill. Steviol glycosides are also already permitted in a wide range of foods and beverages as listed in Schedule 15—5 of the Food Standards Code.

5. The technology assessment conducted by FSANZ considered the identity and chemical properties, physical and chemical properties, the impurity profile and a range of information related to production. FSANZ referenced in all these areas the assessment by JECFA, the WHO/FAO Joint Expert Committee on Food Additives which was reported in 2017 and noted that Reb MD met all requirements, including chemical and microbiological specification parameters, expected in such a food additive.

6. There are accepted international methods for detecting and determining specifications of steviol glycosides including Reb MD and FSANZ concluded that Reb MD met specifications currently listed in the Food Standards Code.

7. The risk assessment assessed history of use of the genetically modified organism *S. cerevisiae* (a yeast with a long history of use in the food supply), its characterisation, stability, safety, allergenicity and toxicity. *S. cerevisiae* is generally considered non-pathogenic to humans and FSANZ concluded that there were no concerns raised regarding the safety of the production of Reb MD or indeed of Reb MD itself.

8. Steviol glycosides have been approved for use in a wide range of foods including in the EU, Canada, USA, several countries in Asia, several countries in central and South America, India, Africa, Israel, Russia and Switzerland.

9. In terms of risk management, steviol glycosides and food additives must be included in the ingredient listing but no other labelling is required. Steviol glycosides and the INS number 960 is currently used for these additives used in foods. FSANZ considered including the term 'steviol glycosides from fermentation' and the INS 960b as adopted by Codex in 2018 but has proposed staying with the root nomenclature of steviol glycosides and INS 960 at this time since other novel production methods for steviol glycosides are progressing through the international systems (JECFA and Codex). Once new numbers and names have been determined for all novel production methods (including fermentation, bioconversion or glycosylation) then the Food Standards Code will be updated to present a coordinated and orderly transition to new names.

10. NZFGC agrees with FSANZ's logic concerning naming and nomenclature but suggests that there should be an administrative limit set after which the Food Standards Code should be amended to reflect the novel production methods available at that time. This will give assurance about future transparency in the food supply.

11. As a result of the purification of Reb MD in the final food, FSANZ concluded that it was highly unlikely that novel protein or DNA would be present. In such circumstances, labelling foods containing Reb MD as GM would not be triggered.

12. NZFGC supports the approach proposed and supports listing Reb MD in the ingredients list as steviol glycoside. NZFGC considers the inclusion of Reb MD as a permitted addition to foods and beverages will result in greater options for both consumers and industry in the sweetener used in such products going forward. Its inclusion would allow New Zealand and Australia to be internationally competitive with Reb MD's use overseas while at the same time encouraging product innovation, especially within the non-alcoholic beverages industry. It also has the potential to contribute to product reformulation over time, a focus in both countries at this time.