



Calorie Control Council

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Electronic Submission to:
Food Standards Australia New Zealand (FSANZ)
Standards Development
Documents for Public Comment
<http://www.foodstandards.gov.au/foodstandards/changingthecode/documentsforpublicco868.cfm>

Re: Application A1034
Advantame as a High-Intensity Sweetener
1st Assessment Report

The Calorie Control Council (the "Council") is an international association representing companies that make and use intense sweeteners. The Council appreciates the opportunity to comment on the first assessment report for Application A1034 for the use of Advantame as a high-intensity sweetener. The Council supports the use of Advantame as an additive according to Good Manufacturing Practice (GMP) in Schedule 2 of Standard 1.3.1, Option 2B

As FSANZ concludes in its 1st Assessment Report of Advantame, the risk assessment of Advantame in accordance to GMPs in different food categories considered in the Application does not raise any public health and safety concerns. The 1st Assessment Report also points out benefits of Option 2, including consumer benefits from having an additional intense sweetener available, greater opportunities for industry to innovate and take advantage of marketing opportunities for Advantame containing products, and FSANZ's lack of need to provide a case-by-case assessment of each new product as it is developed.

Use in accordance with GMP is a good option for intense sweeteners as their use is self limiting, that is off tastes may develop if too much intense sweetener is used in a food or beverage product. In addition, for cost reasons food manufacturers would not use more of an intense sweetener than necessary and they are more and more frequently using sweetener blends which decreases the overall amount of sweetener needed as most sweeteners are synergistic when combined.

The Council is unaware of any data that would counter FSANZ's conclusions that there are no public health or safety issues associated with the proposed addition of Advantame to food. Furthermore, permitting its use is technologically justified.

The 1st Assessment Report states that “There is no research from consumers as to whether they are satisfied with the current range of intense sweeteners or whether those consumers currently consuming approved sweeteners would prefer additional food choices.” The Calorie Control Council has been conducting nationally projectable consumer research in the United States for over 20 years. According to that research, even with the availability of a wide range of intense sweeteners and products containing them, consumers say they would like more products available. Of the consumers using low-calorie, reduced sugar and sugar free products (86% of the U.S. population over 18 years of age) responding to the Council’s most recent survey, 87 percent are interested in being offered additional low-calorie products. Of the products listed, 61percent would like more low-calorie snacks, 57 percent low-calorie cereals, 56 percent low-calorie ice cream/frozen yogurt, 52 percent cakes/pies, 46 percent candy, 41 percent yogurt, 39 percent soft drinks, 36 percent jam/jellies/preserves, and 36 percent puddings and gelatins.

The Calorie Control Council requests that FSANZ adopt Option 2B for the use of Advantame as an additive according to Good Manufacturing Practice in Schedule 2 of Standard 1.3.1. Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, reading "Lyn O'Brien Nabors". The signature is written in a cursive, flowing style.

Lyn O'Brien Nabors
President
Calorie Control Council