

Australian Food and Grocery Council SUBMISSION

18 OCTOBER 2010

TO:

FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:

A1034 - ADVANTAME AS A HIGH-INTENSITY SWEETENER



The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A list of members is included as Appendix A.)

With an annual turnover of \$100 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$49 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$100 billion and value added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

The food and grocery manufacturing sector employs more than 315,000 representing about 3 per cent of all employed people in Australia paying around \$14 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies

1 Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

2 AFGC and KMPG. State of the Industry 2009. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2009.

3 About Australia: www.dfat.gov.au

1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the first assessment report on A1034 - Advantame as a high-intensity sweetener.

The AFGC supports this application on the basis that there is no identified risk to public health and safety, and that the intense sweetener performs a technological function, as intended. The AFGC considers that the availability of this sweetener to the food industry will provide significant opportunities for product development, and significant potential benefit to consumers in the greater availability and choice of foods that may help assist in the management of energy consumption, and therefore weight management.

The AFGC notes that the dietary exposure estimated by FSANZ from foods included in the application is significantly below the ADI for Advantame of 0-5 mg/kg bw. The AFGC supports Option 2B to approve the use of Advantame as an intense sweetener in Schedule 2 of Standard 1.3.1 on the basis of efficiency in amending the Food Standards Code to provide the broadest possible permission for use and to avoid having to make further application to extend the range of foods permitted to add Advantame.

However, the AFGC is also aware that there is the potential for adverse publicity from persons and organisations opposed to the use of aspartame on the basis of alleged concerns over safety. Furthermore, since Australia is the first market in which Advantame will be approved for use, there is the potential for significant media management issues raising the association between Advantame and aspartame and health concerns. The AFGC therefore supports either Option 2A or Option 2B, noting that an essential consideration is the media management of perceived risk necessary for both FSANZ and the applicant, and that a more defensible position will be the limited application of Advantame rather than a broad permission as a Schedule 2 additive.

Recommendation:

That FSANZ proceed to develop a food regulatory measure to amend Standard 1.3.1 of the Food Standards Code to permit the use of Advantame on further discussion and advice with the applicant either:

To permit Advantame in specified foods at specified levels or,

To list Advantame in Schedule 2 of the Standard for use in accordance with GMP.

Membership as at 08 October 2010

Arnett's Biscuits Limited
Asia-Pacific Blending Corporation P/L
Barilla Australia Pty Ltd
Beak & Johnston Pty Ltd
BOC Gases Australia Limited
Bronte Industries Pty Ltd
Bulla Dairy Foods
Bundaberg Brewed Drinks Pty Ltd
Bundaberg Sugar Limited
Byford Flour Mills T/a Millers Foods
Cadbury Pty Ltd
Campbell's Soup Australia
Cantarella Bros Pty Ltd
Cerebos (Australia) Limited
Cheetham Salt Ltd
Christie Tea Pty Ltd
Church & Dwight (Australia) Pty Ltd
Clorox Australia Pty Ltd
Coca-Cola Amatil (Aust) Limited
Coca-Cola South Pacific Pty Ltd
Colgate-Palmolive Pty Ltd
Coopers Brewery Limited
Danisco Australia Pty Ltd
Devro Pty Ltd
DSM Food Specialties Australia Pty Ltd
Earlee Products
FPM Cereal Milling Systems Pty Ltd
Ferrero Australia
Fibrisol Services Australia Pty Ltd
Fonterra Brands (Australia) Pty Ltd
Food Spectrum Group
Foster's Group Limited
Fruco Beverages (Australia)
General Mills Australia Pty Ltd
George Weston Foods Limited
GlaxoSmithKline Consumer Healthcare
Go Natural
Goodman Fielder Limited
H J Heinz Company Australia Limited
Harvest FreshCuts Pty Ltd
Hela Schwarz
Hoyt Food Manufacturing Industries P/L
Hungry Jack's Australia
Johnson & Johnson Pacific Pty Ltd
Kellogg (Australia) Pty Ltd
Kerry Ingredients Australia Pty Ltd
Kimberly-Clark Australia Pty Ltd
Kraft Foods Asia Pacific
Laucke Flour Mills
Lion Nathan Limited
Madura Tea Estates
Manildra Harwood Sugars
Mars Australia
McCain Foods (Aust) Pty Ltd
McCormick Foods Aust. Pty Ltd
McDonald's Australia
Merisant Manufacturing Aust. Pty Ltd

National Foods Limited
Nerada Tea Pty Ltd
Nestlé Australia Limited
Nutricia Australia Pty Ltd
Ocean Spray International Inc
Parmalat Australia Limited
Patties Foods Pty Ltd
Procter & Gamble Australia Pty Ltd
PZ Cussons Australia Pty Ltd
Queen Fine Foods Pty Ltd
QSR Holdings
Reckitt Benckiser (Aust) Pty Ltd
Sanitarium Health Food Company
Sara Lee Australia
SCA Hygiene Australasia
Schweppes Australia
Sensient Technologies
Simplot Australia Pty Ltd
Spicemasters of Australia Pty Ltd
Stuart Alexander & Co Pty Ltd
Sugar Australia Pty Ltd
SunRice
Swift Australia Pty Ltd
Tasmanian Flour Mills Pty Ltd
Tate & Lyle ANZ
The Smith's Snackfood Co.
The Wrigley Company
Tixana Pty Ltd
Unilever Australasia
Wyeth Australia Pty Ltd
Yakult Australia Pty Ltd
Yum Restaurants International

GS1
Harris Smith
IBM Business Cons Svcs
innovations & solutions
KN3W Ideas Pty Ltd
KPMG
Leadership Solutions
Legal Finesse
Linfox Australia Pty Ltd
Meat and Livestock Australia Limited
Monsanto Australia Limited
New Zealand Trade and Enterprise
StayinFront Group Australia
Swisslog Australia Pty Ltd
The Food Group Australia
The Nielsen Company
Touchstone Cons. Australia Pty Ltd
Valesco Consulting FZE
Visy Pak
Wiley & Co Pty Ltd

PSF Members

Amcor Fibre Packaging
Bundaberg Brewed Drinks Pty Ltd
Cadbury Schweppes Asia Pacific
Coca-Cola Amatil (Aust) Limited
Foster's Group Limited
Golden Circle Limited
Lion Nathan Limited
Owens Illinois
Visy Pak

Associate & *Affiliate Members

Accenture
Australian Pork Limited
Australian Dietetic Services
ACI Operations Pty Ltd
Amcor Fibre Packaging
*ASMI
AT Kearney
BRI Australia Pty Ltd
*Baking Association Australia
CAS Systems of Australia
CHEP Asia-Pacific
CSIRO Food and Nutritional Sciences
CoreProcess (Australia) Pty Ltd
Dairy Australia
Exel (Aust) Logistics Pty Ltd
Food Liaison Pty Ltd
FoodLegal
*Foodservice Suppliers Ass. Aust.
*Food Industry Association WA
Foodbank Australia Limited
*Go Grains Health & Nutrition Ltd

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