

HEALTH PROTECTION DIRECTORATE

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1037 – Steviol glycosides – increase in permitted use levels

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1037.

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies and includes expert input by Queensland Health Forensic and Scientific Services.

After considering the documentation, Queensland supports Option 2 – To prepare draft variations to Standards 1.3.1 – Food Additives and 1.3.4 – Identity and Purity to permit an increase to the maximum permitted level of steviol glycosides in the proposed foods.

However, one change we think needs consideration is for the proposed limits for steviol glycosides to be expressed only to a realistic number of "significant figures", viz. 2 rather than 3. Thus, 115 mg/kg might be rounded to 120, 175 and 176 both to 180, 125 to 130 and 208 to 210. The rationale for this is that (a) the third significant figure is meaningless from a toxicology point of view, since toxicology is not a particularly precise science, and (b) it would be unrealistic for manufacturers to formulate foods to that degree of precision.

Yours sincerely

Gary Bielby
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