



Submission from the Australian Beverages Council Ltd

For

**Application A1037 Steviol Glycosides –
Increase in Permitted Use Levels Assessment Report**

Response - February 1, 2011

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Introduction

The Australian Beverages Council Ltd welcomes the opportunity to provide comments in response to the Assessment Report for Application A1037 Steviol Glycosides – Increase in Permitted Use Levels.

The Australian Beverages Council Ltd (ABCL) is the peak industry body for the Australian non-alcoholic beverages industry (including carbonated and non carbonated drinks, juice and juice drinks, ready-to-drink teas and coffees, bottled water, sports and energy drinks). The ABCL represents over 95% of the non alcoholic beverage industry in Australia, comprising large, medium and small members from across the country. ABCL members are listed in Appendix 1.

Comments

The ABCL supports the application to increase the allowed maximum permitted level (MPL) of steviol glycosides (expressed as steviol equivalents) as intense sweeteners, in water based beverages, brewed soft drinks and formulated beverages, up to 200mg/kg.

The ABCL recommends that the MPL of steviol glycosides¹ be increased from 160mg/kg up to 200mg/kg, to be consistent with international permissions and allow for uniformity between domestic and international food standards.

In 2009 the US Food and Drug Administration (FDA) determined steviol glycosides to be Generally Recognised As Safe (GRAS) for use as a general purpose sweetener in foods and beverages².

The French Food Safety Agency (AFSSA) authorised the use of Rebaudioside A, an extract of *Stevia rebaudiana*³, for use as a sweetener in 2009 at levels of 600mg/L (198mg/L steviol equivalents)⁴. This level is in alignment with the EFSA Scientific Opinion on the safety of steviol glycosides.

¹ As steviol equivalents.

² GRAS Associates, LLC, 2009. GRAS Assessment. High Purity Steviol Glycosides.

³ Steviol glycosides (INS 960) are constituents of *Stevia rebaudiana*.

⁴ AFSSA . Arrêté du 8 janvier 2010 modifiant l'arrêté du 26 août 2009 relatif à l'emploi du rébaudioside A (extrait de *Stevia rebaudiana*) comme additif alimentaire. [Order of 8 January 2010 amending the order of 26 August 2009 on the use of rebaudioside A (*Stevia rebaudiana* extract) as food additive].

The European Food Safety Authority (EFSA), Scientific Opinion on the safety of steviol glycosides for use as a food additive in 2010, proposed a maximum level of use of steviol equivalents of 198mg/L, in non-alcoholic water-based flavoured drinks, energy-reduced or with no added sugar⁵.

The Codex Alimentarius Committee on Food Additives is proposing a maximum level of 200mg/kg of steviol glycosides⁶ based on technological need, as a General Standard of Food Additives for water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks⁷.

The ABCL also supports the proposed additional amendments in the assessment report to rationalise and simplify the existing permissions for steviol glycosides and allow clarity and guidance around steviol equivalents. This includes the proposed deletion of certain steviol glycosides permissions (under items 3, 5.2, 11.4 and 14.1.3 in Schedule 1 of Standard 1.3.1) and the provision of instructions on how steviol glycosides are calculated as steviol equivalents in the Standard.

Conclusion

The ABCL supports the application to increase the allowed MPL of steviol glycosides⁶ in water based beverages, brewed soft drinks and formulated beverages, from 160mg/kg up to 200mg/kg, to be consistent with international permissions.

The ABCL also supports the proposed additional amendments to rationalise and simplify the existing permissions for steviol glycosides and allow clarity and guidance around steviol equivalents.

⁵ EFSA Journal 2010;8(4):1537. Scientific Opinion on the safety of steviol glycosides for the proposed uses as a food additive.

⁶ As steviol equivalents.

⁷ Codex Alimentarius Commission. Document CX/FA 11/43/8 November 2010. Joint FAO/WHO Food Standards Programme Codex Committee on Food Additives, 43rd Session, Proposed Draft Food Additive Provisions (New and Revised) of the GFSA.

APPENDIX 1 - CURRENT MEMBERS

Associations

Aluminium Can Group
Australian Beverage Enterprises Co-op Society

Bottlers & Distributors

Alchemy Cordial Company
Alpine Beverages Pty Ltd
Appledale Processors Co-operative Ltd
Aygee Gippsland Pty Ltd
Bayer Australia Limited
Beaudesert Soft Drinks
Bertshell Pty Ltd
Bevco Pty Ltd
Bickfords Australia Pty Ltd
Bundaberg Brewed Drinks Pty Ltd
Cantarella Bros Pty Ltd
Cascade Brewery Co Pty Ltd
Central Burnett Fruit
Coca-Cola South Pacific
Coca-Cola Amatil
Cooks Soft Drinks
Don Kyatt Pty Ltd
Eastcoast Beverages
Emma & Tom Foods Pty Ltd
Fosters Australia
Fruco Beverages
Grove Fruit Juice P/L
Heinz Australia Pty Ltd (formerly Golden Circle Ltd)
IQ Beverages
Jolt Corporation Australia Pty Ltd
Juicy Isle Pty Ltd
Just Squeezed Fruit Juices (NSW) Pty Ltd
Lillyman Bros
Lithgow Valley Springs
Mildura Fruit Juices
Mountain Fresh Fruit Juices
Nippy's Fruit Juices P/L
Nudie Foods Australia Pty Ltd
P & N Beverages Australia Pty Ltd
PepsiCo Australia Holdings Pty Ltd
PET Technologies Ltd
Red Bull Australia Pty Ltd

Saxby's Soft Drinks Pty Ltd
Schweppes (Aust) Pty Ltd
Unilever Australasia
Vitality Brands
Wimmer Marketing Pty Ltd

Suppliers

ABN Amro Australia
Air Liquide Australia Limited
Amcor Australasia
Bev-Cap Pty Ltd
Beverage Holdings Pty Ltd
BIS Shrapnel
Brooke-Taylor & Co
Bundaberg Sugar Ltd
Capitol Ingredient
CHEP
CHR Hansen
Cormack Packaging Pty Ltd
Cuno Pacific
Directus Australia Pty Ltd
Ecolab Pty Ltd
Firmenich Ltd
Fruitmark
Givaudan Australia Pty Ltd
Interaust Foods Pty Ltd
Invita Australia
International Flavours & Frangrances
Johnson Diversey
Juremont Pty Ltd
Kerry Group / Mastertaste
KHS Pacific Pty Ltd
Kingfood Australia
Manildra Harwood Sugars
Matthews Australasia Pty Ltd
MeadWestvaco
Norco Foods
Nugan Quality Foods
O-I Asia Pacific
PureCircle Australia Pty Ltd
Roxset Australia
Scholle Industries Pty Ltd
Sensient Technologies Aust Pty Ltd
Sopura Australia Pty Ltd

Sugar Australia Pty Ltd
Symrise Pty Ltd
Tate & Lyle ANZ Pty Ltd
The NutraSweet Company Pty Ltd
The Product Makers (Aust) Pty Ltd
Tradex NZ & Australia
Victus International
Visypak Beverage Packaging
Zymus International