

Food Standards Australia New Zealand
APPLICATION A1075 – QUILLAIA EXTRACT (QUILLAJA EXTRACT)
AS A FOOD ADDITIVE (EMULSIFIER)

Call for Submissions

6 September 2013

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1075 Quillaia Extract (Quillaja extract) as a Food Additive (Emulsifier)*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market and over \$26 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs over 100,000 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to almost 350,000 in over 85,000 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1075

The NZFGC understands that permission is sought to use quillaia extract as a food additive (emulsifier) for adding oil-soluble substances to various beverages. Quillaia extract is obtained by aqueous extraction of the milled inner bark, stems and branches of the *Quillaia saponaria* Molina tree.

Comments

NZFGC supports the permission being sought for quillaia extract to be used as a food additive. It is surprising that an application has not been made to date since the substance is listed in the Codex Alimentarius General Standard for Food Additives and permitted for use in the EU, the USA and Canada. While those uses have slight variations (categorised as an emulsifier and foaming agent by Codex, approved as a foaming agent in Canada, approved as a flavouring adjuvant, with technological function as emulsifier, stabiliser or foam stabiliser in the USA and approved as an emulsifier, stabiliser, foam stabiliser and encapsulant in the EU) there is commonality and overlap in use that FSANZ has noted and has not prescribed limitations on technical function.

There are also differing levels around the globe where these are set but there is limited commonality for levels. The applicant proposed maximum levels ranging from 30–40 mg quillaia saponins/kg depending on the type of beverage it was added to. The FSANZ risk assessment has resulted in a recommended maximum of 40mg/kg for a range of beverages except for coffee, coffee substitutes, tea, herbal infusions and the like where the maximum is proposed as 30 mg/kg.

FSANZ has also addressed the analytical method necessary for analysis to monitor levels, an activity that has not been undertaken as part of a permission sought by the applicant by any other regulatory agency to date. While such work ensures clarity for both industry and regulators, NZFGC considers that this may be an area FSANZ reconsiders or at least discusses in the future insofar as if no other regulatory agency is requesting this be funded by the applicant then there may be an issue in this being demanded of the applicant by FSANZ. Such an expectation of applicants may present in future as a significant barrier to approvals being sought by international ingredient suppliers leaving the New Zealand manufacturing sector at a disadvantage to similar sectors elsewhere.

As well, NZFGC notes that while there may be no direct costs for governments in rejecting such an application the indirect costs could be the loss in manufacturing opportunity due to such a product not being available impacting in turn on a country's economic well-being and revenue base. There may also be direct costs to the consumer of not having access to products containing such additives if such additives are superior to or more favourable to consumers such as being sourced from natural products.

Finally, NZFGC considers a broadening of the availability of food additives at safe levels enhances the choices available to manufacturers for substances more tailored to specific products so as to better meet consumer expectations and demands. NZFGC therefore supports the draft amendments as proposed by FSANZ.