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File Ref:

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
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Dear Sir / Madam

Submission – Application A1149 – Addition of steviol glycosides to fruit drinks

Thank you for the opportunity to provide comments on the call for submissions paper for Application A1149.

This response provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Concern is raised about the intention to vary the Food Standards Code to permit the use of steviol glycosides as a food additive, with the technological purpose as an intense sweetener, in fruit drinks at a maximum permitted level of 200 mg/kg steviol equivalents. This is because FSANZ's dietary exposure assessment for the extension of use scenario involving fruit drinks estimates that high end consumers of steviol-containing foods are consuming up to 95% of the acceptable dietary intake (ADI) of steviol glycosides.

Because high end consumers of steviol-containing foods may consume close to the recommended ADI of steviol glycosides, it is important that all sources of steviol glycosides are included in the assessment. For example, steviol glycosides are permitted as an excipient ingredient, for use as a sweetener, in Listed and Registered Medicines, by the Therapeutic Goods Administration. It is not clear in the Call for Submissions paper if these substances were included in the dietary exposure assessment. Secondly, because of the proximity to the recommended ADI threshold, it raises the question about how to handle future applications requesting permission to add steviol glycosides to other foods, for which its use is technologically justified.

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One of the Food Regulation System priorities for 2017-2021 is *to reduce chronic disease related to overweight and obesity. This will include evaluating the effectiveness of existing initiatives and identify potential new initiatives, such as how the food regulation system can facilitate healthy food choices* ... Permitting artificial sweeteners does not align with this priority because it reinforces consumer preference for sweet foods, rather than promoting positive behavioural change towards less sweet foods, with potentially with less calories.

The last comment is not specifically related to Application A1149. Queensland Health considers that it would be useful to include in any Call for Submissions paper a description of the adverse effects that may result from exceeding the ADI for the substance under consideration. Although this information is provided in the Supporting Document, an up-front understanding of the nature and severity of any adverse reaction in the Call for Submissions paper would assist in the initial evaluation of the application or proposal. This information could be summarised in a few sentences, with the reader referred to the relevant supporting document for further, more detailed, information.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Branch, Queensland Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

Food Safety Standards and Regulation Unit
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Department of Health
Queensland Government