

Project Officer Application A1176
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

7th October 2019

Dear Sir/Madam

Application A1176 – Enzymatic production of Steviol Glycosides

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make:

NZFS supports the amendment to the Australia New Zealand Food Standards Code (the Code) for a new specification that will allow an enzymatic conversion process to produce steviol glycoside preparations, using three enzymes derived from genetically modified strains of *Escherichia coli* K-12, namely two UDP-glucosyltransferases and sucrose synthase.

NZFS notes that FSANZ will consider changes to the International Numbering System (INS) number for steviol glycosides in the future, if further changes are made to the Codex INS list.

NZFS supports FSANZ's risk and technical assessment, and notes that the risk assessment has not identified any health or safety concerns.

Draft variation contained in Attachment A to the Call for Submission paper

Schedule 3 – we agree that Schedule 3 should be amended to allow for a variation to the specification for steviol glycosides from *Stevia rebaudiana* Bertoni (S3—35) to include steviol glycosides (Reb D, Reb M and Reb AM).

Additionally, the sweetness potency of preparations of steviol glycosides with a high Reb AM content was determined to be approximately 150 times sweeter than sucrose. This is less than that currently in the specification in S3—35. NZFS agrees with the amendment to the specification to refer to approximately 150-300 times sweeter than sucrose.

Schedule 18 – we agree that Schedule 18 should be amended, permitting the use of the protein engineered enzymes UDP-glucosyltransferase and sucrose synthase, sourced from (GM) *E. coli* as processing aids for the production of Reb D, Reb M or Reb AM.

Yours sincerely