



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

FOOD STANDARDS AUSTRALIA NEW ZEALAND -

**A1176 – ENZYMATIC PRODUCTION OF STEVIOL
GLYCOSIDES**

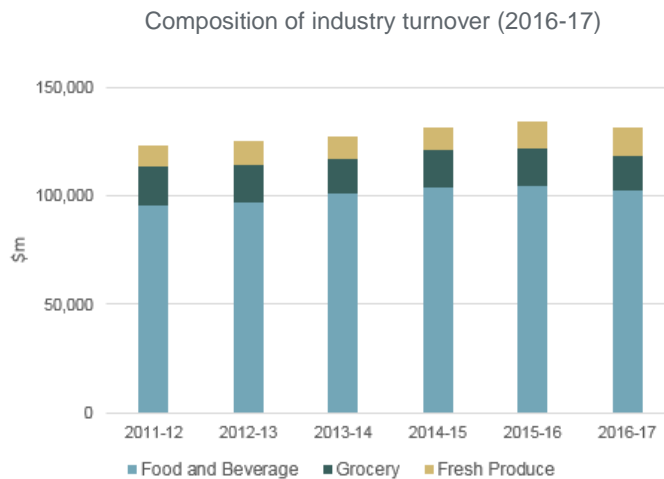
8 October 2019

Sustaining Australia

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia’s food, drink and grocery manufacturing industry.

There are over 180 member companies, subsidiaries and associates who together comprise 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.



With an annual turnover in the 2016-17 financial year of \$131.3 billion, Australia’s food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation’s future prosperity.

The diverse and sustainable industry is made up of over 36,086 businesses and accounts for over \$72.5 billion of the nation’s international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2016-17 on research and development.

Food, beverage and grocery manufacturing together forms Australia’s largest manufacturing sector, representing 36 per cent of total manufacturing turnover in Australia.

The food and grocery manufacturing sector employs more than 324,450 Australians, representing almost 40 per cent of total manufacturing employment in Australia.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 42 per cent of the total persons employed being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government’s economic, industrial and trade policies.

OVERVIEW

The Australian Food and Grocery Council (AFGC) welcomes this opportunity to comment on Food Standards Australia New Zealand's (FSANZ) call for submissions on *Application A1176 Enzymatic production of steviol glycosides*.

The AFGC has reviewed both the Application and FSANZ's risk assessment. Both documents provide comprehensive, detailed and convincing scientific evidence that the new methodology for producing steviol glycosides with improved organoleptic characteristics when incorporated into food products presents no consumer food safety or health implications. Consequently the AFGC supports *Application A1176 Enzymatic production of steviol glycosides*.

COMMENTS

STEVIOLE GLYCOSIDES MEETING A CONSUMER NEED

Steviol glycosides have been used as intense sweeteners in a range of food products for a number of years. Being isolated from plants, albeit with some purification and processing, they have been welcomed by consumers as "natural" and are viewed favourably in comparison to some of the earlier generation chemically synthesised intense sweeteners. Industry has used them in food products promoted to consumers on the basis of their reduced sugar and energy content. As such they assist consumers to construct healthy diets aligned to the Australia and New Zealand Dietary Guidelines with a primary benefit of assisting body weight control.

ALIGNMENT WITH FOFR PRIORITIES

The Ministerial Forum on Food Regulation has identified as a priority for the food regulation system "Supporting the public health objectives to reduce chronic disease related to overweight and obesity". The use of intense sweeteners in food products is clearly aligned with that objective. Their value, however, depends heavily on consumer acceptance. As has been reported in the Application the steviol glycoside variants resulting from the use of the new enzymatic methodology have improved taste profiles compared to other forms of steviol glycosides. This will result in greater consumer acceptance of the products with more consumers likely to continue using products with the new steviol glycosides once they have tried them.

SAFETY OF THE PRODUCTS HAS BEEN CONFIRMED

The new steviol glycoside variants have a similar safety profile to the other steviol glycoside forms as:

1. they are produced as highly purified food additives (>95%)
2. they share similar digestion and metabolic fates to other forms when ingested
3. the microbial source of the enzymes – *E.coli K12* – is non-pathogenic and has a history of safe use in the food processing industry

4. no allergy issues have been identified with the enzymatic proteins used in the methodology as they are effectively removed from the steviol glycoside products, and
5. other relevant and competent agencies overseas have agreed they can be used safely in foods as proposed by the applicant.

The AFGC agrees with the FSANZ safety assessment which has not identified any health or safety concerns associated with the steviol glycosides as described in the application. Furthermore the AFGC agrees that *Acceptable Daily Intake* of 0 – 4 mg/kg body weight for steviol does not need changing as a result of the new forms of steviol glycoside being approved.

The AFGC also notes that although genetic modification techniques were used to derive the enzymes used to synthesize the new steviol glycoside variants no safety issues associated with these techniques (either on the proteins or DNA involved) were identified.

CONCLUSION

The AFGC commends both the Applicant and FSANZ for the thoroughness with which the science, methodology and safety confirmation of the production and potential use in food products has been described and assessed. The AFGC has not identified any issues with the application which would warrant its progression through the food regulatory system being delayed or denied.

Recommendation:

The Australian Food and Grocery Council recommends the amendment to the ANZ Food Standards Code sought in Application *A1176 Enzymatic production of steviol glycosides* be supported.