

**Food Standards Australia New Zealand**  
**PROPOSAL P1020 – ETHYL LAUROYL ARGINATE AS A FOOD**  
**ADDITIVE IN SAUSAGES**

**14 May 2012**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on Proposal P1020 Ethyl Lauroyl Arginate as a Food Additive in Sausages – Assessment Report.

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. A number of these manufacturers and suppliers are major importers and exporters in New Zealand. NZFGC member companies supply over 95 percent of the processed food and beverages to the New Zealand grocery retail industry and over 70 percent of supermarket packaged good sales.

The NZFGC is aware that FSANZ assessed ethyl lauroyl arginate as a Food Additive in 2009 and concluded that it was a safe and suitable food additive for use in a variety of food categories. At that time, FSANZ recommended variations to Standard 1.3.1, Schedule 1 – Food Additives, to include permissions for ethyl lauroyl arginate. The permissions were to cover the addition of ethyl lauroyl arginate in a range of food types, including for processed comminuted meat and poultry products, at specified maximum limits for the active ingredient, ethyl-N<sup>α</sup>-lauroyl-L-arginate.HCl. The proposal for permission to add the new additive to processed comminuted meat was intended to include sausage and sausage meat containing raw, unprocessed meat.

**Comments**

The NZFGC supports the conclusion reached by FSANZ in 2009 and confirmed in February 2010 and therefore the conclusion reached in the current Proposal P1020 that would see the Australia New Zealand Food Standards Code amended to provide for ethyl lauroyl arginate to be used as an additive in sausages.

The NZFGC notes that the reasons for including ethyl lauroyl arginate in the Australia New Zealand Food Standards Code in 2009 remain valid and included the following:

- the detailed safety assessment had concluded that the permission to use ethyl lauroyl arginate did not raise any public health and safety concerns, including consideration of the development of antimicrobial resistance
- use of ethyl lauroyl arginate as a preservative in the specified food categories up to the maximum permitted level was technologically justified and it could potentially be a useful component of food preservation systems. Based on data provided by the

Applicant at the time, FSANZ suggested that ethyl lauroyl arginate could possibly replace some approved food grade preservatives such as benzoates, sulphates and sorbates, which have some inherent limitations

- the regulatory impact assessment concluded that the benefits of the potential use of ethyl lauroyl arginate in the specified food categories outweighed any costs associated with its use.

The NZFGC has also re-examined the review report published by FSANZ in February 2010. The issues addressed by FSANZ at review were primarily safety related (chemical safety, potential side effects of arginine in humans, calculation of the maximum permitted level, differences between the levels proposed by FSANZ and those set by other regulators, and the use of unpublished scientific data) or enforcement related (absence of suitable ethyl lauroyl arginate analysis method). FSANZ addressed each of these issues and the proposed amendment was approved following review in 2010.

NZFGC is strongly supportive of developments that might enhance the use of food whilst at the same time reducing negative impacts for consumers.

While it would have been helpful to have sighted the proposed draft amendment, given there was an omission in 2009, NZFGC is confident the proposed amendment will address the omission appropriately in the Schedules to Standard 1.3.1.

For further information, please contact:

Carole Inkster  
New Zealand Food & Grocery Council  
Email: [REDACTED]