

19 December 2016

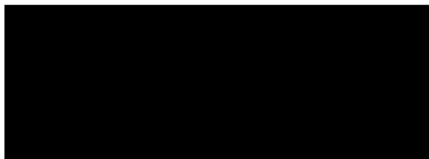
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1132: Broaden Definition of Steviol Glycosides (Intense Sweetener)***.

Yours sincerely

A solid black rectangular box used to redact the signature of Katherine Rich.

Katherine Rich  
**Chief Executive**



**Call for submissions – Application A1132:  
*Broaden Definition of Steviol Glycosides  
(Intense Sweetener)***

**Submission by the New Zealand Food & Grocery Council**

**19 December 2016**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1132: Broaden Definition of Steviol Glycosides (Intense Sweetener)***.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

### OVERARCHING COMMENTS

3. NZFGC supports expanding the definition of steviol glycosides as proposed. We note that steviol glycosides benefit people who want to maintain a reduced-kilojoule diet or people with special medical conditions that require reduced sugar intakes such as diabetics and that expanding the definition may assist these people.
4. We also note that steviol glycosides are permitted food additives in the Codex Alimentarius General Standard for Food Additives (GSFA), and in many countries including the USA, EU, Canada and many Asian, and Central and South American countries.
5. FSANZ did not identify any public health and safety issues with expanding the definition of steviol glycosides and this was a key factor in our support. NZFGC agrees with the application of an estimated steviol conversion factor for these various additional, minor steviol glycosides in order to assist manufacturers maintain compliance with maximum permitted levels. We note that labelling of any steviol glycosides will be under the collective term ‘steviol glycosides’ for stating in the ingredients list for packaged foods containing them.

### SPECIFIC COMMENTS

#### ***Application***

6. FSANZ states that the Application seeks to amend the current definition of steviol glycosides to include all minor steviol glycosides (potentially an extra 40) extracted from the *Stevia rebaudiana* Bertoni (stevia) leaf. The addition of these minor steviol glycosides to the *Australia New Zealand Food Standards Code* (the Food Standards Code) will be in addition to the 10 steviol glycosides currently listed. These minor steviol glycosides claim to provide improved flavour and taste compared to the currently permitted steviol glycosides.

#### ***Current Standard***

7. Permissions for steviol glycosides are currently provided:
  - as “steviol equivalents” which are calculated using an equation in Standard 1.3.1 *Food Additives*, subsection 1.3.1—4(7). The calculation uses conversion factors (CFs) which are provided for the different steviol glycosides in the subsection. The basic steviol structure itself has a conversion factor of 1.00
  - for addition to various food categories with maximum permitted levels in Schedule 15 – *Substances that may be used as food additives* and specifically in the table to section S15—5 (Table of permissions of food additives).

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### ***International permissions***

8. FSANZ reports that steviol glycosides are listed by Codex and are approved in the USA (38 at the time the application to FSANZ was made), the EU (10 listed), Canada (a similar application as has been made to FSANZ has been made to Health Canada), Asia (Japan, India, South Korea, China, Malaysia, Indonesia, Singapore and Taiwan), Central and South America (Brazil, Argentina, Paraguay, Uruguay, Mexico, Peru and Columbia) and in Israel, Russia, Switzerland, Turkey and Ukraine.

### ***Risk Assessment***

9. FSANZ did not identify any public health and safety issues with expanding the definition of steviol glycosides or for the existing Acceptable Daily Intake (ADI) of 0-4 mg/kg bodyweight, which is expressed on the basis of steviol, to be applicable to all steviol glycosides in stevia leaf. The key biological assumption is that all steviol glycosides will be hydrolysed completely to steviol by gut microflora on consumption.
10. The proposed steviol glycoside mixtures are intended to be marketed for use as intense sweeteners under the same conditions as those presently approved for steviol glycoside preparations. No new dietary exposure assessment was therefore considered necessary.

### ***Steviol conversion factor (CF)***

11. There are CFs for the ten currently permitted steviol glycosides in Standard 1.3.1. These are provided so that manufacturers can calculate the level of 'steviol' to ensure they comply with the maximum permitted levels in the Food Standards Code. FSANZ proposes that the minor steviol glycosides be assigned a CF of 0.33, which is a median figure between the 0.25 and 0.4 CFs for the various additional minor steviol glycosides.

### ***Labelling***

12. Substances used as food additives are required to be stated in the ingredients list of packaged foods. The name 'steviol glycosides' is proposed to apply to any of the listed and minor steviol glycosides with the INS code of '960'.

### ***Conclusion***

13. NZFGC supports expanding the definition of steviol glycosides as proposed. We note that steviol glycosides benefit people who want to maintain a reduced-kilojoule diet or people with special medical conditions that require reduced sugar intakes such as diabetics and that expanding the definition may assist these people.
14. NZFGC agrees with the application of a steviol conversion factor of 0.33 for the various additional minor steviol glycosides. NZFGC notes that labelling of any of the specific steviol glycosides will be under the collective term 'steviol glycosides', for the purposes of inclusion in the ingredients list for foods in which they are used.