

Project Officer Application A1172  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6036

26 March 2019

Dear Sir/Madam

## Application A1172 – Enzymatic production of Rebaudioside D (Call for submissions)

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

### *General comments*

MPI supports the amendment to the Australia New Zealand Food Standards Code (the Code) to allow for a novel production method for Rebaudioside D (Reb D). We agree that the Code does not currently permit the applicant's production method for Reb D.

### *Risk assessment*

MPI supports the risk and technical assessment, and agrees that Reb D using this production method should be permitted.

### *Labelling comments, including INS number*

We note that no changes are included for food additive ingredient listing requirements under Standard 1.2.4. This means that all permitted forms of steviol glycosides will be declared as INS 960 or by the name steviol glycosides. The changes made to the INS list at CCFA this year distinguish the steviol glycosides extracted from the plant, from those made using alternative technologies. This is so consumers are more fully informed. The new numbers are:  
960 (a) Steviol glycosides from *Stevia Rebaudiana* Bertoni (Steviol glycosides from Stevia), and  
960 (b) Steviol glycosides from fermentation  
960 (b)(i) Rebaudioside A from multiple gene donors expressed in *Yarrowia lipolytica*.

The effect of this change is that the parent number (960) is superseded by the more specific numbers (960(a), 960 (b)(i)).

As more sub-categories are added under the parent INS 960 additional numbers will be added.

We suggest the Approval Report explains that changes to the INS numbers in the Code will be needed in future, to distinguish between plant sources of steviol glycosides, compared to those produced using novel technologies. This is in order to align with the revisions to the INS, enabling consumers to be informed about the source of the steviol glycosides.

*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 the novel production method for Reb D.

In July 2018, the Codex Alimentarius Commission adopted the JECFA specification for “Steviol glycosides from **Stevia rebaudiana** Bertoni” (i.e. its tentative status was removed). Section 3(2) in the code has been updated and refers to (xii) FAO JECFA Monographs 20 (2017); it is our understanding that this means S3-35 is no longer required (refer to the FSANZ report on A1132, where this is discussed), as the JECFA specification now includes any mixture of steviol glycoside compounds derived from *Stevia rebaudiana* Bertoni, rather than being limited to nine named leaf-derived steviol glycosides.

If our understanding is correct, this will affect subsections S3—31 and S3—32.

The title of subsection S3-35 may need revising, as it will include information specifically for high purity Reb M and Reb D only.

**Schedule 18** – we agree that Schedule 18 should be amended, to permit the enzymes as a processing aid in the manufacture of Reb D.