



26th March 2019

Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143

Submission for Application A1172 – Enzymatic production of Rebaudioside D

Dear Sir or Madame,

The New Zealand Beverage Council (NZBC) represents the manufacturers of New Zealand's juice, carbonated drink and bottled water brands, and their suppliers. The Association has established a Voluntary Code of Practice that is aimed at ensuring accurate and truthful labelling on products. In particular, the Code signifies compliance with the relevant Food Regulations and Fair Trading requirements. This system is at the forefront of industry self-regulatory developments in New Zealand and over 95 per cent of the sold in New Zealand is supplied by NZBC members who are signatories to the Code.

The New Zealand Beverages Council, acting on behalf of the non-alcoholic refreshment beverages industry in New Zealand, would like to indicate its strong support for a new manufacturing process for Rebaudioside D (Reb D), produced via enzymatic conversion from stevia extract. Under the current specification for steviol glycosides from *Stevia rebaudiana* Bertoni, the proposed production method is not included and therefore not permitted.

In recent years, both Australia and New Zealand have actively been working towards addressing the issue of rapidly increasing obesity rates and associated chronic disease. Sugar in the diet has been highlighted as a major contributor to obesity and chronic disease, and it is therefore incumbent on the regulator to consider safe and suitable alternatives to reduce energy intake derived from sugars. The recognition of new non-nutritive sweeteners directly supports industry to further innovate in response to consumer demands for greater choice of low and no kilojoule products alongside public health policy initiatives to improve the food supply.

The NZBC would like to indicate its strong support for the addition of the proposed new production method for manufacturing Reb D. It is important to consider the following points in relation to the current application.

- The NZBC supports the inclusion of Reb D produced through this new method as steviol glycoside with an INS number of 960 within the category of currently permitted foods as well as foods that will be approved in the future. Currently Reb D manufactured through this production process is permitted in a number of overseas markets. This would allow New Zealand to become competitive with these markets.
- Further, we would be mindful to avoid the omission of any one non-alcoholic beverage class, as has been the case with A1149 *Steviol glycosides in fruit drinks*. This omission has been an impediment to the beverage industry's ability to innovate in this category and has exhausted many hours of both industry and FSANZ assessment time in preparing and reviewing the submission.
- The NZBC supports alignment of this Application with the current identity and purity specification for steviol glycosides noting the same assay requirements of no less than 95% total steviol glycosides apply to Reb D. Further, we also support the continued use of the current ADI for Steviol Glycosides given that FSANZ's risk assessment has not identified any safety concerns associated with Reb D produced using the enzyme processing aid UGT-A.
- The NZBC supports Rebaudioside D produced by this method not requiring 'genetically modified' labelling. Although the enzyme used has been modified using gene technology, the raw material is not from a genetically modified source. The enzyme used as a processing aid is unlikely to be present in a food for sale which contains Rebaudioside D. Nevertheless, the NZBC feels that 'GMO free' claims or claims of similar meaning on products using Rebaudioside D produced by this method would be inappropriate.

We thank Food Standards Australia New Zealand for the opportunity to provide this submission and look forward to working with FSANZ on the Applications and Proposal identified in the coming years.