

Australian Food and Grocery Council SUBMISSION

09 FEBRUARY 2011

TO:

FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:

A1037 STEVIOL GLYCOSIDES - INCREASE IN PERMITTED
USE LEVELS



PREFACE

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

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A list of members is included as Appendix A.)

With an annual turnover of \$100 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.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$49 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$100 billion and value added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development. The food and grocery manufacturing sector employs more than 315,000 representing about 3 per cent of all employed people in Australia paying around \$14 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³. It is essential for 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.

This submission has been prepared by Mr Tony Mahar, Director Sustainable Development for further inquiries please contact:

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

² AFGC and KMPG. State of the Industry 2009. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2009.

³ About Australia: www.dfat.gov.au

1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the assessment report for Application A1037 *steviol glycosides - increase in permitted use levels*.

The AFGC supports this application on the basis that there is no identified risk to public health and safety, that it is technologically justified, that it is to companies to make commercial decisions as to whether or not to use this product, and that sufficient information is provided to consumers to enable informed purchasing decisions.

Recommendation – support the preferred approach:

That FSANZ prepare draft variations to Standards 1.3.1 – Food Additives and 1.3.4 – Identity and Purity to permit an increase to the maximum permitted level of steviol glycosides in the proposed foods.

2. SPECIFIC COMMENTS

2.1. The Application

AFGC notes that the FSANZ technical and risk assessment report conclude:

“The proposed increases in the maximum permitted levels of steviol glycosides in ice cream and selected beverages are technologically justified and supported by taste trials as providing a more acceptable taste profile to consumers.

Toxicological and other relevant data published subsequent to the original FSANZ assessment raise no concerns regarding the safety of steviol glycosides and do not indicate a need to change the existing ADI of 0-4 mg/kg bw/day, expressed as steviol equivalents.”

AFGC supports the proposed increase in the maximum permitted use level for steviol glycosides (expressed as steviol equivalents) as an intense sweetener in water-based beverages from 160mg/kg to 200mg/kg in the Food Standards Code. Given that there are no identified safety concerns, and that it is technologically justified, AFGC considers that the application should be supported on the basis of providing industry with the necessary flexibility and opportunity for product innovation and development. Furthermore, by harmonising with international standards, there is greater opportunity for industry in facilitating trade and providing consumers with a greater range of products.

AFGC notes that Codex is proposing a level of 200mg/L for water-based flavoured drinks (14.1.4) in the GSFA. The FSANZ risk assessment and is also consistent with the use levels for steviol glycosides included in the European Food Safety Authority (EFSA) Scientific Opinion on the Safety of Steviol Glycosides (April 2010)⁴.

⁴ [Revised exposure assessment for steviol glycosides for the proposed uses as a food additive](#)

Australian Food and Grocery Council

AFGC MEMBERS LIST – AS AT 13 DECEMBER 2011

Arnott's Biscuits Limited
 Asia-Pacific Blending Corporation P/L
 Barilla Australia Pty Ltd
 Beak & Johnston Pty Ltd
 Beerenberg Pty Ltd
 Bickfords Australia
 BOC Gases Australia Limited
 Bronte Industries Pty Ltd
 Bulla Dairy Foods
 Bundaberg Brewed Drinks Pty Ltd
 Bundaberg Sugar Limited
 Byford Flour Mills T/a Millers Foods
 Campbell's Soup Australia
 Cantarella Bros Pty Ltd
 Cerebos (Australia) Limited
 Cheetham Salt Ltd
 Christie Tea Pty Ltd
 Church & Dwight (Australia) Pty Ltd
 Clorox Australia Pty Ltd
 Coca-Cola Amatil (Aust) Limited
 Coca-Cola South Pacific Pty Ltd
 Colgate-Palmolive Pty Ltd
 Coopers Brewery Limited
 Danisco Australia Pty Ltd
 Devro Pty Ltd
 DSM Food Specialties Australia Pty Ltd
 Earlee Products
 Eagle Boys Pizza
 FPM Cereal Milling Systems Pty Ltd
 Ferrero Australia
 Fibrisol Services Australia Pty Ltd
 Fonterra Brands (Australia) Pty Ltd
 Food Spectrum Group
 Foster's Group Limited
 Frucor Beverages (Australia)
 General Mills Australia Pty Ltd
 George Weston Foods Limited
 GlaxoSmithKline Consumer Healthcare
 Go Natural
 Goodman Fielder Limited
 Gourmet Food Holdings
 H J Heinz Company Australia Limited
 Harvest FreshCuts Pty Ltd
 Healthy Snacks
 Hela Schwarz
 Hoyt Food Manufacturing Industries P/L
 Hungry Jack's Australia
 Johnson & Johnson Pacific Pty Ltd
 Kellogg (Australia) Pty Ltd

Kerry Ingredients Australia Pty Ltd
 Kimberly-Clark Australia Pty Ltd
 Kraft Foods Asia Pacific
 Laucke Flour Mills
 Madura Tea Estates
 Manildra Harwood Sugars
 Mars Australia
 McCain Foods (Aust) Pty Ltd
 McCormick Foods Aust. Pty Ltd
 McDonald's Australia
 Merisant Manufacturing Aust. Pty Ltd
 National Foods Limited
 Nerada Tea Pty Ltd
 Nestlé Australia Limited
 Nutricia Australia Pty Ltd
 Ocean Spray International Inc
 Parmalat Australia Limited
 Patties Foods Pty Ltd
 Procter & Gamble Australia Pty Ltd
 Queen Fine Foods Pty Ltd
 QSR Holdings
 Reckitt Benckiser (Aust) Pty Ltd
 Sanitarium Health Food Company
 Sara Lee Australia
 SCA Hygiene Australasia
 Schweppes Australia
 Sensient Technologies
 Simplot Australia Pty Ltd
 Spicemasters of Australia Pty Ltd
 Stuart Alexander & Co Pty Ltd
 Sugar Australia Pty Ltd
 SunRice
 Swift Australia Pty Ltd
 Tasmanian Flour Mills Pty Ltd
 Tate & Lyle ANZ
 The Smith's Snackfood Co.
 The Wrigley Company
 Tixana Pty Ltd
 Unilever Australasia
 Vital Health Foods (Australia) Pty Ltd
 Wyeth Australia Pty Ltd
 Yakult Australia Pty Ltd
 Yum Restaurants International

Associate & *Affiliate Members

Accenture
 Australian Pork Limited
 ACI Operations Pty Ltd

Amcor Fibre Packaging
 *ASMI
 AT Kearney
 BRI Australia Pty Ltd
 *Baking Association Australia
 CAS Systems of Australia
 CHEP Asia-Pacific
 CSIRO Food and Nutritional Sciences
 CoreProcess (Australia) Pty Ltd
 Dairy Australia
 Food Liaison Pty Ltd
 FoodLegal
 *Foodservice Suppliers Ass. Aust.
 *Food industry Association WA
 Foodbank Australia Limited
 *Go Grains Health & Nutrition Ltd
 GS1
 Harris Smith
 IBM Business Cons Svcs
 innovations & solutions
 KN3W Ideas Pty Ltd
 KPMG
 Leadership Solutions
 Legal Finesse
 Linfox Australia Pty Ltd
 Meat and Livestock Australia Limited
 Monsanto Australia Limited
 New Zealand Trade and Enterprise
 RQA Asia Pacific
 StayinFront Group Australia
 Strikefoce Alliance
 Swire Cold Storage
 Swisslog Australia Pty Ltd
 The Food Group Australia
 The Nielsen Company
 Touchstone Cons. Australia Pty Ltd
 Valesco Consulting FZE
 Visy Pak
 Wiley & Co Pty Ltd

PSF Members

Amcor Fibre Packaging
 Bundaberg Brewed Drinks Pty Ltd
 Schweppes Australia Pty Ltd
 Coca-Cola Amatil (Aust) Limited
 Foster's Group Limited
 Golden Circle Limited
 Lion Nathan Limited

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