

# FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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## SUBMISSION

20 July 2015

Attention: **Project Manager – A1108**

Food Standards Australia New Zealand  
Box 7186,  
Canberra BC,  
ACT, Australia, 2610.

### Re: **Rebaudioside M as a Steviol Glycoside Intense Sweetener**

FTA Australia has reviewed this [Application](#) and endorses the following comments of the Technical Sub Committee:

The Committee tentatively agreed with Option 1 – to prepare a draft variation to the revised Code with the following comments:

1. As the Draft Specification for the Assay, as shown in the Specification for Rebaudioside M in the draft variation of Schedule 3, S3-31, is a completely new document and separate from the current JECFA specification for Steviol Glycosides, does this mean that JECFA are or are not going to prepare an amended or new Specification for this new substance?
2. If JECFA are preparing a new or amended specification, when will this be available and official?
3. The draft Specification in Schedule 2 – ‘Variation of Schedule 3’ in Attachment A to this ‘Call for Submissions’ in section S3-31 (2) (a) does not make sense and requires clarification, as there two separate issues combined in one statement. It is assumed that:
  - (i). The substance that will be known as ‘Rebaudioside M’ will contain a minimum of 95% of the chemical named in section S3-31 (2) (b) with Formula Weight of 1,291.3.
  - (ii). Rebaudioside M will also be one part of the total of components of the mixture known as “Steviol Glycosides” which have a 95% minimum purity as per the Specification in JECFA.
  - (iii). See section 2.2.2 - Reb M specification in the ‘Call for Submissions’, which has some clarification re the above but this clarification is not translated into the draft variation.
4. Regarding the draft paragraph S3-31 (3) this statement cannot be compliant as currently Steviol Glycosides are included in section S3-2, as part of subsection

(1)(b)(v) and which does not contain any mention of 'Rebaudioside M'. – see above comment 2.

5. Will the INS number for Rebaudioside M be also 960 as for current Steviol Glycosides?
6. As there are no permissions in other international jurisdictions for Rebaudioside M and combined with above questions and comments which should have been addressed in the original Application, it is suggested that further information be supplied in a second round 'Call for Submissions'.

If there are any queries regarding this submission, please contact the Technical Secretary, [REDACTED]  
[REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Application](#).

Yours sincerely,

Del Teesdale,  
PRESIDENT – FTA AUSTRALIA