

7 August 2015

SUBMISSION concerning Application A1108 (application made to permit rebaudioside M to be added to the current list of permitted steviol glycosides used as intense sweeteners)

The International Stevia Council (ISC) would like to thank the Foods Standards Australia New Zealand (FSANZ) for the opportunity to provide comment on their draft food regulatory consideration of “Rebaudioside M as a steviol glycoside intense sweetener” and for it to be added to the current list of permitted steviol glycosides.

We commend the FSANZ on their draft approval of Rebaudioside M as an additional steviol glycoside to the permitted steviol glycosides; Rebaudiosides A, B, C, D, E, F, Dulcoside A, Stevioside, Steviolbioside, and Rubusoside.

We agree with the specification outlined in section 2.6, Table 1 of the supporting document 1, “*Risk and technical assessment report - Application 1108*”, where total steviol glycosides is to include any of the eleven steviol glycosides to make more than or equal to 95%. It should be noted that Rebaudioside E had been an approved steviol glycoside according to European Union (Commission Regulation (EU) No. 231/2012). It should also be noted that Note 1 of Table 1, should read as follows; “Total steviol glycosides to include any of the eleven listed steviol glycosides:....”, as opposed to “ten” as currently noted in Note 1. Furthermore, it should also be noted that in Note 2 of Table 1, the document states that Rebaudioside E is one of the nine steviol glycosides in the current JECFA specification, however, this is not the case. Rebaudioside E is not one of the nine in the current JECFA specification. Malaysia’s petition to change the JECFA steviol glycoside specification proposes to include both Rebaudiosides E and M. However, the current European regulation has all ten molecules in their specification as listed in the Note 2 of Table 1.

Regarding section 2.2.4 on labeling: It is generally believed that the term “steviol glycosides” is not the preferred labeling term by consumers for a sweetener derived from the stevia plant. For example, based on consumer research in the United States of America (USA) it has been observed that the term “stevia leaf extract” is recognized by consumers as a sweetener from natural source and this label term has been used by industry members to communicate the fact that a given food and/or beverage product is made with a stevia sweetener. We therefore, strongly recommend that the labeling of steviol glycosides derived from the stevia leaf should have the option of using the term “stevia leaf extract” or, “stevia leaf extract (960)” or, “stevia leaf extract (steviol glycosides)” or, “stevia leaf extract (sweetener)”. For example, “stevia leaf extract” is now accepted by the Indonesian authorities as a way to label a food and/or beverage that contains a natural steviol glycoside sweetener derived from the stevia plant.

Lastly, in light of the continued growing obesity epidemic and all of the related metabolic diseases, the consumer desire to reduce calories and sugar in their diet remains top of mind. Therefore, the approval of rebaudioside M that supports the use of stevia as a natural sweetener for foods and beverages will



enable consumers to benefit from a greater variety of reduced-calorie and reduced-sugar foods to help meet their personal health and nutrition goals of calorie and sugar reduction.

The International Stevia Council is a not-for-profit international trade association representing the interests of companies that produce stevia extracts, manufacturers using stevia extracts in final consumer products and companies that grow stevia leaves.

If there are any questions please do not hesitate to contact us at :

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Thank you.

Best regards,

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