



Food Standards Australia New Zealand
PO Box 10559
The Terrace WELLINGTON 6143
NEW ZEALAND

By Email

Dear Sir / Madam,

SUBMISSION
A1129 -Monk Fruit Extract as a Food Additive

We thank FSANZ for the opportunity to provide a submission in support of monk fruit extract as a permitted food additive.

Frucor Suntory Ltd. is an Australasian manufacturer of non-alcoholic beverages with a brand portfolio that includes leading brands of waters, fruit juices, fruit drinks, energy drinks, sports drinks, sports waters, soft drinks and organic kombucha.

Our personnel are active members of the New Zealand Beverage Council (NZBC), the Australian Beverage Council Ltd (ABCL), New Zealand Food and Grocery Council (NZFGC), New Zealand Nutrition Foundation and the NZ Fruit & Vegetable Alliance (NZ FAVA) by providing executive and technical expertise on several working groups within these organisations.

Frucor Suntory looks to take a lead role within the beverage sector via new product development (NPD), with strategies that support a commitment to providing healthier options for consumers. We are quietly getting on with reformulating more of our product range to reduce sugar without affecting the taste. On-going innovation across our beverage portfolio includes the offering of specific lower sugar/zero sugar drinks, smaller pack sizes (smaller volume bottles), and functionality.

Frucor Suntory New Zealand Limited

frucorsuntory.com

As a member of the ABCL, we will be working on the ABCL Sugar Reduction Pledge in which the non-alcoholic beverage industry has committed to a 20 per cent reduction in sugar across the industry's portfolio by 2025.

The non-alcoholic beverage sector requires a level of agility and flexibility to enable ongoing innovation and to provide consumers with a wide choice of quality low and no sugar beverages. Monk fruit extract provides drinks with more appealing sensory characteristics than other non-nutritive sweeteners that are currently available.

Monk fruit extract as an ingredient is used extensively across a number of markets including the USA, Japan and China. Almost 300 food and beverage products containing monk fruit have launched globally.

We note that Food Standards Australia and New Zealand [FSANZ] has concluded that monk fruit extract does not have any public health and safety issues and, no Adequate Daily Intake [ADI] has been set.

Our submission follows separately.

Yours sincerely



On behalf of Frucor Beverages Ltd.



Nutrition & Claims Manager
Frucor Beverages Limited

SUBMISSION

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We would like to provide the following comments in relation to application A1129 by Saraya Co., Ltd. (Saraya) to permit the use of monk fruit extract as a food additive to perform the technological purpose of an intense sweetener. Monk fruit provides a natural alternative to artificial sweeteners with an improved taste profile to other natural intense sweeteners currently available.

Frucor Suntory supports:

1. the approval of monk fruit extract as an intense sweetener
2. permitting a choice to refer to the ingredient as either *monk fruit extract* or *luo han guo extract*
3. allowing monk fruit extract to be used in beverages through either the addition of monk fruit extract to:
 - a. Schedule 16-2 Additives permitted under GMP; or
 - b. referencing the following food classes under Schedule S15-5:

| Food class number | Food class name |
|-------------------|---|
| 1.1.2 | Liquid milk products and flavoured liquid milk |
| 1.2.2 | Fermented milk products and rennetted milk products |
| 13.3 | Formulated meal replacements and formulated supplementary foods |
| 13.4 | Formulated supplementary sports foods |
| 14.1 | Non-alcoholic beverages and brewed soft drinks |

As stated in the Call for Submissions, “Based on the reviewed toxicological data, it is concluded that in the absence of any identifiable hazard, an acceptable daily intake (ADI) ‘not specified’ is appropriate for monk fruit extract. A dietary exposure assessment is therefore not required.” As an ADI is not specified and there are no safety issues, we see no issue in expanding the categories of permitted use.

Expanding the categories permitted will provide greater benefit to both consumers and industry. Industry will be able to formulate a wider range of products containing lower sugar with natural additives thus giving consumers a wider choice of lower kilojoule products – something consumers are looking for.