

***Application A1191:
Mono- and diglycerides of fatty acids (INS 471)
as glazing agent for fruits and vegetables.***

Submission made by:

United Fresh
New Zealand Incorporated

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Submitted to submissions@foodstandards.gov.au on 15 October 2020

Introduction

United Fresh is the only pan-produce industry body in New Zealand. Our membership includes growers, grower organisations, pack-houses, wholesalers, and service & logistics providers, as well as retailers. Our industry aims to provide New Zealand a healthy and safe supply of quality produce. Our vision is to create a sustainable fresh fruit and vegetable industry for New Zealand.

United Fresh is the open forum for the horticultural and produce industries where we come together and work on industry 'good' issues. This creates an umbrella across our industry for external communication with government, the public, media or international organisations.

A significant part of our role is to communicate with government agencies and international organisations on matters relating to the fresh produce industry as a whole particularly those issues that have the potential to impact on our membership along the entire fresh produce value chain.

With this in mind United Fresh, on behalf of the New Zealand Produce Industry, submit the following comments for your consideration in relation to **Application A1191: Mono- and diglycerides of fatty acids (INS 471) as glazing agent for fruits and vegetables.**

United Fresh also welcomes the opportunity to comment on the proposed changes by way of this submission.

Situation Overview

The fresh produce industry has used glazing agents and treatments to enhance both the shelf life and appearance of fresh produce, both for minimally processed products that have been cut and/or peeled as well as for whole unprocessed fruits and vegetables. Use of the glazing agent is voluntary and its contribution to the diet is extremely low.

We note that the additive is already permitted in the Food Standards Code but does not have permission for the proposed purpose of use as a glazing agent for fresh fruit and vegetables. The current application is for an extension of the permission of an additive assessed as safe.

THE APPLICATION

Apeel Sciences (Calif, USA) has sought to extend the use of the currently permitted food additive, mono- and diglycerides of fatty acids (INS 471) as a glazing agent for fresh fruits and vegetables in the Australia New Zealand Food Standards Code (the Food Standards Code). This additive is already permitted in the Food Standards Code used for Good Manufacturing Practice (GMP) but it does not have permission for the proposed purpose of use as a glazing agent for fresh fruit and vegetables.

DETAILED COMMENTS

1. Edible films and coatings on fresh produce have been around for nearly a century. They have been used by commercial growers to prevent loss of moisture and to create a shiny fruit surface for aesthetic purposes. However, not all fresh produce is capable of withstanding the application treatments involved. This is not the case with INS 471. These coatings can be applied to a wider range of produce using tailored application processes now available commercially.
2. FSANZ conducted a risk and technical assessment which concluded that it was safe (as had been the conclusion internationally of JECFA and the Codex Alimentarius in the General Standard for Food Additives), that performed the technological function of a glazing agent. Even if used widely on fruit and vegetables in Australia and New Zealand, INS 471 would only contribute 0.6-0.8% of mean total fat intake across the population.
3. Internationally the additive is approved for use on fresh fruit and vegetables in Japan, Mexico, Peru, USA, and the EU.
4. Edible glazing products generally and INS 471, provide a safe means of extending and preserving products to limit food wastage and plastics use (as an alternative preservation means) and so contribute positively to the environment.
5. The labelling required (in the ingredients listing of packaged food) is no different to that of many other food additives.

Summary

United Fresh is fully supportive of the proposed draft amendments to the Food Standards Code to permit INS 471 to have its application extended to include fresh fruit and vegetables.