

9 September 2005

Project Officer Application P298
Food Standards Australia New Zealand
PO Box 10559
WELLINGTON 6036

Dear Sir/Madam

Application P298 – Benzoate and Sulphite Permissions in Food – Initial Assessment Report

Thank you for the opportunity to comment on this proposal. The New Zealand Food Safety Authority (NZFSA) has the following comments to make.

NZFSA supports the review of the use of benzoates and sulphites in food, including refining the exposure estimates reported in the 21st Australian Total Diet Survey, and if necessary, consideration of ways to reduce consumption of these preservatives among those exceeding the ADI. NZFSA agrees with FSANZ that the estimated dietary exposures reported in the 21st Australian Total Diet Survey show that for the majority of people of all ages, there is no public health risk from eating a balanced diet that includes food prepared using sulphites and benzoates.

NZFSA has undertaken an exposure assessment of preservatives for New Zealand children. The work has been done by the Institute of Environmental Science and Research Limited (ESR). The report is due to be finalised by the end of September 2005 and will be made available to FSANZ to consider alongside other information.

In the New Zealand survey, mean and 95th percentile estimates of preservative dietary exposure were calculated using food concentration data and food consumption data from the New Zealand National Children's Nutrition Survey (2002).

Estimates of dietary exposure from the New Zealand survey were low compared to most international estimates, and were generally lower than estimates for the Australian population

from the 21st Australian Total Diet Study. Recalculation of New Zealand exposure estimates using Australian concentration data suggested that most of the differences in exposure estimates between New Zealand and Australia are due to differences in the preservative levels in foods, rather than modelling differences.

Sausages were the main food contributing to estimated sulphite dietary exposure for New Zealanders aged 5-15 years, with smaller contributions from soft drinks, hamburger patties, cordial and dried apricots. Estimated benzoate dietary exposure is almost solely due to soft drink consumption.

Yours sincerely

Carole Inkster
Director
Joint Food Standards

