

HEALTH PROTECTION DIRECTORATE

Enquiries to: Gary Bielby
Principal Environmental Health
Officer, Food Safety Policy and
Regulation Unit,
Environmental Health Branch
Telephone: 07 3328 9324
Facsimile: 07 3328 9354
Email: gary_bielby@health.qld.gov.au
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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1034 – Advantame as a High-Intensity Sweetener

Thank you for the opportunity to provide a submission on the 1st Assessment Report for Application A1034.

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies and includes expert input by Queensland Health Forensic and Scientific Services.

Queensland supports the preferred approach – To proceed to develop a food regulatory measure, to amend Standard 1.3.1 – Food Additives, to permit the use of Advantame in specified foods at specified levels or, alternatively, consider the use of Advantame as an additive according to Good Manufacturing Practice (GMP) in Schedule 2 of Standard 1.3.1.

As regards the analysis of the Advantame in food, the summary of the analytical method presented indicates that Queensland Health Forensic and Scientific Services (and most other well equipped food laboratories) would have the equipment necessary to do the final determinative step. However, section 2.1.3 in the Supporting Document states that "the samples are dissolved in a solution of 70% water: 30% acetonitrile".

Such a procedure may be appropriate for some food matrices such as soft drinks and tabletop sweeteners, but might not be adequate for more complex matrices like dairy-based products and meal replacements. These might require an extraction and purification step. Details of this aspect may or may not be given in the Application.

If Food Standards Australia New Zealand decides to proceed to the second stage of the assessment, Queensland would appreciate the provision of full analytical method details so that Queensland Health Forensic and Scientific Services can comment on it.

Office
Level 1, 15 Butterfield Street,
Herston QLD 4006

Postal
PO Box 2368, Fortitude Valley
BC QLD 4006

Phone
(07) 3328 9323

Fax
(07) 3328 9354

In addition, information is sought on the stability of Advantame in food applications involving heat and/or acid.

Yours sincerely

Gary Bielby
Principal Environmental Health Officer
Food Safety Policy and Regulation Unit
Environmental Health Branch