

11 March 2011

Project Officer Application A1034  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

FS350-117-1034

Dear Sir/Madam

## **Application A1034 – Advantame as a High Intensity Sweetener – Second Assessment Report**

Thank you for the opportunity to comment on this application. The Ministry of Agriculture and Forestry (MAF) has the following comments to make.

MAF supports Option 2B to list Advantame in Schedule 2 of Standard 1.3.1, as there is no need to limit exposure by setting maximum permitted levels in foods. We note that the exposure assessments conclude that the potential intakes are below 3% of the estimated ADI, and there are no identifiable public health risks arising from acceptance of the proposal.

We note that the derivation of the ADI is conservative. It is based on a main rabbit study in which toxicity was seen at high doses, even though this effect was not seen in the preliminary rabbit study. We agree with FSANZ's conclusion that more data clarifying the mechanism of the toxicity would be needed if a higher ADI were to be established.

Yours sincerely

Jenny Reid

**Manager Food Safety**  
**Science, Information & Risk Directorate**

**Ministry of Agriculture and Forestry**  
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