

Ai GROUP SUBMISSION

Response to FSANZ Application
A1100 – Maximum Permitted Level
of Acesulphame Potassium in
Chewing Gum

SEPTEMBER 2015



About Australian Industry Group

The Australian Industry Group (Ai Group) is a peak industry association in Australia which, along with its affiliates, represents the interests of more than 60,000 businesses in an expanding range of sectors: manufacturing, engineering, construction, automotive, food, transport, information technology, telecommunications, call centres, labour hire, printing, defence, mining equipment and supplies, airlines, health and other industries. The businesses which we represent employ more than one million people. Ai Group members operate small, medium and large businesses across a range of industries. Ai Group is closely affiliated with many other employer groups and directly manages a number of those organisations.

The Ai Group represents the Australian and New Zealand confectionery industry through its Confectionery Sector, representing manufacturers of chocolate, sugar and gum confectionery; suppliers of ingredients, machinery, packaging materials and services to the industry, and wholesaler and distributor firms. The Ai Group has approximately 130 confectionery sector members. Major confectionery manufacturing plants are principally located in New South Wales, Tasmania and Victoria, including in a number of regional locations (eg Ballarat and Lithgow) and in South Australia, Queensland and New Zealand where SME businesses are based.

Australian Industry Group contact for this submission

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Submission: Application A1100 – Maximum Permitted Level of Acesulphame Potassium in Chewing Gum

The Australian Industry Group (Ai Group) Confectionery Sector welcomes the opportunity to comment on Food Standards Australia New Zealand (FSANZ) Application A1100 – Maximum Permitted Level of Acesulphame Potassium in Chewing Gum made by The Wrigley Company.

SPECIFIC COMMENTS

The Ai Group Confectionery Sector supports Application A1100 to increase the maximum permitted level of the intense sweetener food additive acesulphame potassium (Ace K) in chewing gum from 2000mg/kg to 5000mg/kg.

The increase seeks to more appropriately align with other international regulations and is consistent with the Harper Review on competition policy as it relates to importing. The benefit of international regulatory alignment allows international companies to standardise formulations globally, resulting in improved operational efficiencies and reduced regulatory burden.

The proposed increase supports industry innovation, growth opportunities and global competitiveness. The Wrigley Company and other confectionery/gum manufacturers will have increased flexibility to develop flavour profiles in chewing gum that are currently available in other overseas markets but not in Australia and New Zealand. The Application does not bestow exclusivity to The Wrigley Company.

The Ai Group notes that FSANZ's risk assessment has concluded that there is no public health and safety concern associated with the proposed increased in the level of Ace K in chewing gum and that the increase is technologically justified.

Additionally, the unity rule remains unchanged where mixes of additives performing the same technological function are used which means Australia/New Zealand regulations remain more restrictive than in other countries where Ace K is permitted to be added at the maximum level proposed by this Application without the unity rule.

We also note FSANZ's cost benefit analysis supports the regulatory variation, to increase the level of Ace K to 5000mg/kg, for all major stakeholders – consumers, industry and government with minimal regulatory impact.

Thank you again for the opportunity to comment and support Option 1 to permit the increase in the maximum permitted level of Ace K in chewing gum based on safety and technological justification.

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