



Calorie Control Council

1100 JOHNSON FERRY ROAD, SUITE 300 • ATLANTA, GA 30342 • (404) 252-3663 • FAX (404) 252-0774
E-MAIL: CCC@KELLENCOMPANY.COM • WWW.CALORIECONTROL.ORG

August 7, 2015

Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610
Australia

Food Standards Australia New Zealand
PO Box 10559
The Terrace Wellington 6143
New Zealand

RE: Rebaudioside M as a Steviol Glycoside Intense Sweetener (Call for Submissions –
Application A1108)

Dear Sir or Madame,

The Calorie Control Council (the “Council”) is an international association of manufacturers of low-calorie, reduced-fat and “light” foods and beverages. Companies that make and use low-calorie sweeteners, including stevia, are among the Council’s members. The Council would like to provide comments on the draft regulatory consideration of “Rebaudioside M as a steviol glycoside intense sweetener,” which was notified by Food Standards Australia New Zealand (FSANZ).

We commend the FSANZ on their draft approval of Rebaudioside M as an additional steviol glycoside to the permitted steviol glycosides, which currently include Rebaudiosides A, B, C, D, E, F, Dulcoside A, Stevioside, Steviolbioside, and Rubusoside.

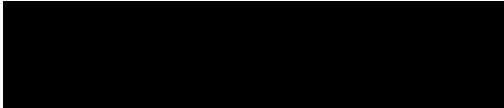
The Council agrees with the specification outlined in section 2.6, Table 1 of the supporting document 1, “Risk and technical assessment report - Application 1108,” where it is noted that total steviol glycosides should include any of the eleven steviol glycosides to make more than or equal to 95% purity. It should be noted that Rebaudioside E had been an approved steviol glycoside according to European Union (Commission Regulation (EU) No. 231/2012). We also recommend that Note 1 of Table 1 state that steviol glycosides include any of the **eleven** steviol glycosides, as opposed to “ten” as currently noted in Note 1. Furthermore, it should also be noted that in Note 2 of Table 1, the document states that Rebaudioside E is one of the nine steviol glycosides in the current Joint FAO/WHO Expert Committee on Food Additives (JECFA) specification. However, this is not the case as it is not one of the nine listed in the current JECFA specification. Malaysia’s petition to change the JECFA steviol glycoside specification proposes to include both Rebaudiosides E and M. However, the current European regulation has all ten molecules in their specification as listed in the Note 2 of Table 1.

Regarding section 2.2.4 on labeling, it should be noted that the term “steviol glycosides” may not be the preferred labeling term by consumers for a sweetener derived from the stevia plant. We therefore strongly recommend that the labeling of steviol glycosides derived from the stevia leaf should have the option of using the term “stevia leaf extract” or, “stevia leaf extract (960)” or, “stevia leaf extract (steviol glycosides)” or, “stevia leaf extract (sweetener)”. For example, “stevia leaf extract” is now accepted by the Indonesian authorities as a way to label a food and/or beverage that contains a natural steviol glycoside sweetener derived from the stevia plant.

Lastly, in light of the continued growing obesity epidemic and all of the related metabolic diseases, the consumer desire to reduce calories and sugar in their diet remains top of mind. Therefore, the approval of Rebaudioside M supports the use of stevia as a sweetener for foods and beverages which will enable consumers to benefit from a greater variety of reduced-calorie and reduced-sugar foods to help meet their personal health and nutrition goals of calorie and sugar reduction.

In conclusion, the Calorie Control Council urges FSANZ to consider the Council's comments. Thank you for the opportunity to provide comment on this impactful regulation.

Sincerely,



Haley Curtis Stevens, Ph.D.
President
Calorie Control Council