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06th November 2018

Submission for Application A1149 – Addition of Steviol Glycosides in Fruit Drinks

Dear Sir or Madam,

The New Zealand Beverage Council (NZBC) represents the manufacturers of New Zealand's juice, carbonated drink and bottled water brands, and their suppliers. The Association has established a Voluntary Code of Practice that is aimed at ensuring accurate and truthful labelling on juice products. In particular, the Code signifies compliance with the relevant Food Regulations and Fair Trading requirements. This system is at the forefront of industry self-regulatory developments in New Zealand and over 95 per cent of the juice sold in New Zealand is supplied by NZBC members who are signatories to the Code.

The Beverages Council, acting on behalf of the non-alcoholic refreshment beverages industry in New Zealand, tables the following submission relating to the assessment of the organisation's application to amend the Australia New Zealand Food Standards Code (the Code) to extend the use of steviol glycosides as a food additive, with the technological purpose as an intense sweetener in fruit drinks at a maximum level of 200 mg/kg steviol equivalents.

The Beverages Councils Position

The Beverages Council notes the assessment of the application by FSANZ concluded that:

“there are no public health and safety concerns from the extension of use of steviol glycosides to fruit drinks at the proposed levels.”

Justification for Use

The Beverages Council again highlights the importance of this application to the industry. The permission of steviol glycosides in non-alcoholic beverages is an essential part of supporting innovation as industry works to provide consumers with a wider variety of low and no kilojoule beverages. As stated in the NZBC's application the use will allow for a 30 – 50 per cent reduction in sugar to standard fruit drinks – an important reduction in support of the industry's efforts to reduce obesity and chronic disease.

The NZBC **supports** the conclusion made by FSANZ that: *“the use of steviol glycosides as a food additive in fruit drinks, is technologically justified in the quantity and form proposed.”*

Dietary Assessment

The Beverages Council notes that *“FSANZ's previous assessments of steviol glycosides raised no concerns about the safety of steviol glycosides and did not indicate a need to amend the ADI”*.

The Beverages Council thanks FSANZ for its collaborative approach to the dietary assessment process which supported this application. Working closely with industry to refine the usage of steviol glycosides allowed for a clearer understanding of the consumption of steviol glycosides at the baseline in the categories of use. Without the cooperation of FSANZ and collaboration with industry, it would not have been possible to refine the concentration values and show *“the ADI will not be exceeded by permitting the extension of use of steviol glycosides to fruit drinks at the MPL of 200 mg/kg steviol equivalents.”*

The NZBC **supports** the successful collaboration between FSANZ and industry which has shown the ADI will not be exceeded. The NZBC supports this application as a valuable case study in gathering the most up to date information for dietary exposure assessments.

Permission of Future Permitted Forms of Steviol Glycoside

The Beverages Council acknowledges that steviol glycosides are performing an important role as consumers continue to show a preference for plant-based intense sweeteners. As new forms of steviol glycosides become commercially available and FSANZ approves their use, it is important that the fruit drink category is permitted to contain steviol glycosides to enable beverage manufacturers to create more innovative products with reduced sugar and comparable palatability to fruit juice.

The NZBC **fully supports** FSANZ decision to amend Schedule 15 to extend the use of steviol glycosides.

Conclusion

The Beverages Council, on behalf of the non-alcoholic refreshment beverages industry in New Zealand, strongly supports FSANZ assessment of Application A1149 Addition of steviol glycosides in fruit drinks and the prepared draft variation to:

Amend Schedule 15 by inserting item 14.1.2.2.1 of the table to section S15—5 an entry for steviol glycosides with a maximum permitted level of 200 mg/kg steviol equivalents. The effect of this amendment will be to permit, for the purposes of Standards 1.1.1 and 1.3.1, the use in fruit drink of steviol glycosides subject to a maximum permitted level of 200 mg/kg steviol equivalents.

We thank Food Standards Australia New Zealand for the opportunity to provide this submission and look forward to working with FSANZ on the Applications and Proposal identified in the coming years.

Isabel Buerschgens
Chair NZBC Technical Advisory Group