Application A1149
Addition of Steviol Glycosides to Fruit Drinks
Call for submissions paper

Submission

The NSW Food Authority (NSWFA) welcomes the opportunity to comment on Application A1149 – Addition of steviol glycosides to fruit drinks.

Key points

NSW notes that the dietary exposure modelling for steviol glycosides (hereon referred to as 'stevia') at the higher end of exposure using the 'refined' approach (SD1 for Application 1149) is nearing the average daily intake limit of 4mg/kg of body weight per day determined by FSANZ. This is before modelling from this application is included. Once this application is included, intakes for high end consumers are projected to be only 0.2mg/kg bw/day below the ADI threshold.

'The mean and 90th percentile dietary exposures across the population groups assessed for the Refined baseline ranged between 1.4-1.8 mg/kg bw/day and 2.2-3.5 mg/kg bw/day, respectively. For the Refined extension of use scenario including fruit drinks, dietary exposures were 1.5-1.9 mg/kg bw/day and 2.3-3.8 mg/kg bw/day, respectively. The increase in dietary exposure by permitting use of steviol glycosides in fruit drinks is 0.1 mg/kg bw/day at the mean and 0.1-0.4 mg/kg bw/day at the 90th percentile'.

Source: Page i, SD1 for Application 1149.

NSW is unsure whether stevia sources from imported foods or goods listed on the Australian Register of Therapeutic Goods (ARTG) have been included in the 'refined' modelling. Clarification from FSANZ would be appreciated.

NSW notes that the 'baseline' concentration provided in Table 4 of SD1 represent the legally permitted limits for stevia in Schedule 15 of the Food Standards Code (pg 15-17 of SD1 of Application 1149). Notwithstanding the role of GMP and general business practice of using the minimum concentration required to achieve the desired sweetening effect, total dietary exposures for stevia are nearing daily thresholds determined by FSANZ for high end consumers in levels added now.

NSW is concerned that consumers may not have adequate information concerning total dietary intake of stevia to ensure they stay below the recommended daily intake thresholds. NSW requests that FSANZ consider some form of consumer risk communication to enable consumers to make informed purchase choices in progressing Application 1149.

NSW further notes that sugar as an ingredient in food is under increasing pressure due to the high incidence of obesity and overweight in the general community. There is a current stream of work on the bi-national food regulation workplan concerning possible labelling of sugars on food and drinks as a consumer health information initiative. Given this increasing pressure, it is expected that food re-formulation to decrease sugar content but retain sweetness will increase over time. NSW anticipates further stevia applications will be forthcoming.

Given the high likelihood of further stevia applications, NSW suggests that FSANZ should review overall stevia permissions in the Food Standards Code and the food supply to provide intelligence on the growth of the sugar substitute market as an input for the food regulation priority 'supporting the public health objectives to reduce chronic disease related to overweight and obesity'.

It is further suggested that stevia concentrations in permitted foods is considered by FSANZ under a future Australian Total Diet Survey as a future surveillance activity to ensure timely and accurate data on actual stevia concentrations in the Australia New Zealand food supply.

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.