



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

FSANZ APPLICATION – A1158
*ROSEMARY EXTRACT AS A FOOD
ADDITIVE*

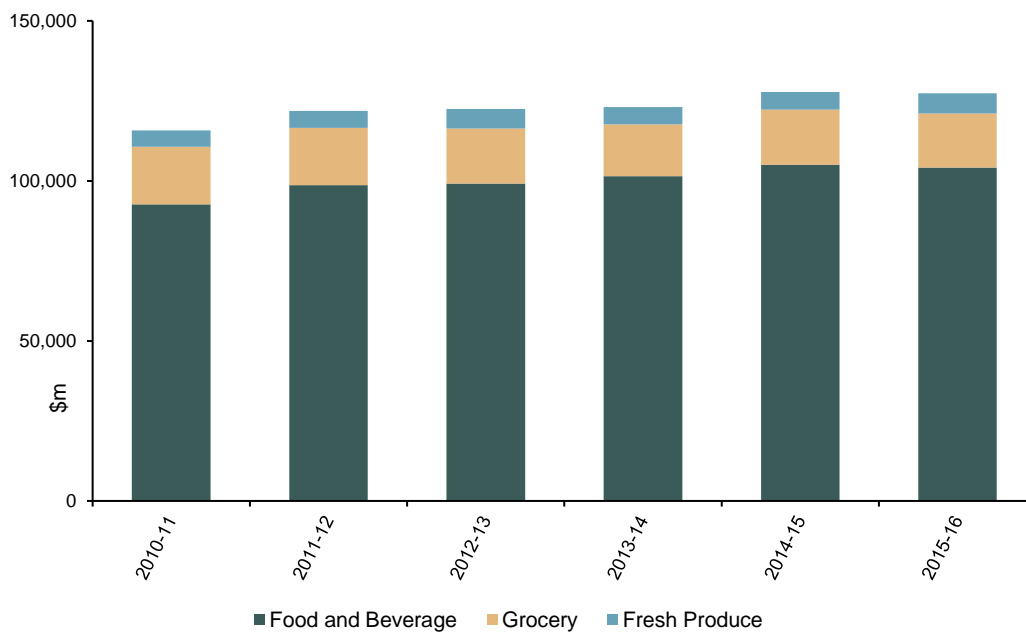
Sustaining Australia

1. PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 180 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Figure 3.1: Composition of the defined industry's turnover (\$2015-16) (million)



With an annual turnover in the 2015-16 financial year of \$127.4 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector is Australia's largest manufacturing industry. Representing 32.4 per cent of total manufacturing turnover in Australia.

The diverse and sustainable industry is made up of over 30,748 businesses and accounts for over \$67.9 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2015-16 on research and development.

The food and grocery manufacturing sector employs more than 320,300 Australians, representing about 2.6 per cent of all employed people in Australia, paying around \$17.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 40 per cent of the total persons employed being in rural and regional Australia. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

2. SUBMISSION

The Australian Food and Grocery Council (AFGC) provides this submission in response to the Food Standards Australia New Zealand (FSANZ) *Application Paper – A1158: Rosemary extract as a food additive: to permit the use of rosemary extract as a food additive with the technological purpose of an antioxidant*.

The AFGC has reviewed the Supporting Document 1 – *Risk and Technical Assessment Report – Application A1158* prepared by FSANZ and supports the positions expressed therein.

The AFGC supports Kalsec Inc's application to change the Australia New Zealand Food Standards Code to permit the use of rosemary extract as a food additive. The application specifically seeks to use the extract as an antioxidant in a range of foods where a maximum permitted level (MPL) is specified for each food.

Rosemary extract is isolated from the leaves of the rosemary plant by ethanol or acetone extraction. The extraction and subsequent processing steps yields an extract which is enriched in two antioxidant compounds called carnosol and carnosic acid. The two compounds have been well characterised chemically and as antioxidants and are added to foods to increase stability and extend shelf-life. The AFGC recognises that rosemary has a long history of safe use in many countries as a culinary herb.

The AFGC notes that FSANZ has determined that rosemary extract performs an antioxidant function and that there are internationally accepted and established specifications for rosemary extract used as an antioxidant.

The AFGC recognises that FSANZ has previously identified several studies involving supplementation of the diet of pregnant and lactating dairy ewes and goats. It is noted that no adverse effects were identified in these studies. In addition, no concerns were identified in human studies although FSANZ states that scientific literature information is limited in relation to tolerance.

The AFGC acknowledges that FSANZ found that there was no evidence from the safety assessment or dietary exposure assessment that would result in a different acceptable daily intake (ADI) to that of the Joint FAO/WHO Expert Committee on Food Additives 2017 (JECFA) that being 0-0.3mg/kg bodyweight for rosemary extract, expressed as the sum of carnosic and carnosol respectively.

The AFGC notes that for the proposed MPL scenarios, mean dietary exposures to carnosic acid plus carnosol for consumers only were 25–55% of the ADI and P90 exposures were 50–110% of the ADI depending on the population group being assessed. In addition, it was determined that the dietary exposure estimates based on MPLs are highly conservative and likely to be an overestimate of dietary exposure to carnosic acid plus carnosol due to the following reasons:

1. the scenarios assume that all foods within a category contain rosemary extract at the MPL and all of the foods within the food categories requested to contain rosemary extract will use rosemary extract; and
2. that consumers always eat the products containing rosemary extracts at these concentrations over a lifetime.

As a result of the respective MPL scenarios, FSANZ found that the dietary exposures estimated for carnosic acid plus carnosol from naturally occurring sources through the consumption of rosemary leaves contributed minimally to the overall exposure estimated in all MPL and Usual Use scenarios. Based on the safety and dietary exposure assessments, and currently available toxicological data, the AFGC supports the FSANZ statement that there is no evidence of a public health and/or safety risk associated with adding rosemary extract as an antioxidant to the specified foods.

The AFGC compliments FSANZ on the extensive work performed in relation to the Supporting Document 1 - *Risk and Technical Assessment Report* – Application A1158 and supports the application by Kalsec Inc. to permit the use of rosemary extract as a food additive with the technological purpose of an antioxidant.