

SUBMISSION FROM SA HEALTH 25 October 2018

A1161 – Potassium Polyaspartate as a food additive in wine: to permit the use of Potassium Polyaspartate as a food additive in wine at a maximum permitted limit of 100mg/L

SA Health welcomes the opportunity to provide comment on this application. It is noted that this application has only one period of public comment. SA Health is concerned that before supporting this application for the approval that further toxicological assessment may be appropriate.

Alcohol use disorders are common in Australia. There is evidence in the literature that chronic alcohol abuse may lead to reduced gut integrity in affected individuals.

The main premise for the limited toxicological assessment of potassium polyaspartate in Application 1161 is because “Such studies are not considered to be necessary based on the in vitro findings indicating that gastrointestinal digestion and absorption of potassium polyaspartate is likely to be minimal”.

This finding relates to the section of the report titled ‘intestinal absorption’ (p 9) and specifically “No effects of undigested or digested potassium polyaspartate on intestinal membrane integrity was observed whereas the positive control, ethanol (20%), significantly reduced membrane integrity”.

Given that potassium polyaspartate is seeking permission as a food additive in wine (typical ethanol content 12-17%) it may be appropriate for FSANZ to be certain that intestinal absorption of potassium polyaspartate remains negligible in the presence of the positive control (ethanol) – which is the context in which the food will be made available to the community.

It is recognised that in accordance with paragraph 1.2.4—2(3)(b) of Standard 1.2.4 as a general rule, the requirement to provide a statement of ingredients, including food additives does not apply to standardised alcoholic beverages. Therefore, like most other food additives when used in standardised alcoholic beverages, the requirement to provide a statement of ingredients will not apply when potassium polyaspartate is used in wine, sparkling wine and fortified wine.

As the food additive presence is not disclosed to the consumer, it is important that the toxicological assessment provide assurance that the food additive is safe for the public. The assessment does not address any potential allergenicity of potassium polyaspartate, and given that the additive is not labelled on wine, it could be a potential hazard to allergic consumers who will be unaware of it being added. FSANZ should confirm that the additive has been assessed as having no allergenicity concerns.