

15 December 2023

Project Manager

Food Standards Australia New Zealand

PO Box 5423

KINGSTON ACT 2604

AUSTRALIA

RE: Submission – A1273 - Steviol glycosides as a food additive in Food for special medical purposes [270-23], 17 November 2023

Following are the comments that the Australian Institute of Food Science & Technology Limited (AIFST) wishes to present on the *Call for submissions – Application A1273: Steviol glycosides as a food additive in food for special medical purposes*.

Thank you for the opportunity to provide input to the Call for Submissions for A1273.

If you require any further information, please do not hesitate to contact me.

Sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted contact information]



Call for submissions – Application A1273: Steviol glycosides as a food additive in food for special medical purposes.

**Submission by the Australian Institute of Food
Science & Technology Limited (AIFST)**

15 December 2023

Australian Institute of Food Science & Technology Limited (AIFST)

The Australian Institute of Food Science and Technology Limited (AIFST) is a not-for-profit organisation representing food industry professionals working in all facets of the food industry including food science, food technology, engineering, sensory, new product development, innovation, regulatory, QA, nutrition, microbiology, and food safety, as well as those in leadership positions within the academic, industry and private sectors.

AIFST's mission is to advance and inspire all food sector professionals through education, collaboration, and recognition, to champion a robust, innovative, science-based Australian agri-food industry to meet future food needs.

Food science is at the heart of what we do, and we aim to champion food science and food scientists.

Position

AIFST **supports** permission for the food additive, steviol glycosides, for use in the manufacture of Food for Special Medical Purposes (FSMP).

AIFST **supports** the proposed maximum permitted level (MPL) of the food additive of 330 mg/kg (as steviol equivalents) in very low energy foods produced for consumption as part of a very low energy diet (VLED).

AIFST **notes** the proposed maximum permitted level (MPL) of the food additive of 75mg/kg (as steviol equivalents) for all other FSMP. This level is significantly lower than international permissions and will no doubt result in issues for imported products.

Overall Comments

AIFST has reviewed the *Call for Submissions* document including the supporting risk and technical assessment material.

AIFST notes a reason for the requested amendment is to align the Code with international permissions, including those of the European Union (EU), and with provisions listed in the Codex Alimentarius (Codex) standard as FSMP products that contain steviol glycosides cannot yet be sold in Australia or New Zealand because the additive needs to be specifically approved by Food Standards Australia New Zealand (FSANZ) for addition to such products.

AIFST notes the draft variation to the Code proposed by FSANZ results in permissions for steviol glycosides to be used as a food additive in FSMP including very low energy foods produced for consumption as part of a VLED and all other FSMP which are not aligned with international permissions.

Specific Comments

International MPLs

Internationally, Codex permits the addition of steviol glycosides to FSMP between 270 and 350 mg/kg. The EU permits addition of steviol glycosides as follows:

- 13.2 Dietetic foods for special medical purposes (excluding products of food category 13.1.5): Steviol glycosides: maximum 330 mg/kg.
- 13.3 Dietary foods for weight control intended to replace total daily food intake or an individual meal (the whole or part of the total daily diet): Steviol glycosides: maximum 270 mg/kg.

FSANZ notes that this food category is broader than Standard 2.9.5 in the Code, as some products may fall under Standard 2.9.3 – Division 2 (Formulated meal replacements).

Singapore permits the addition of steviol glycosides to FSMP up to 175 mg/kg, and Turkey permits the addition of steviol glycosides to FSMP up to 330 mg/kg (excluding products for infants and young children). Distinctions are not made for the levels in very low energy diet as distinct from other FSMP.

While supportive of the limit of Steviol Glycoside at 330mg/kg on VLED foods, AIFST is disappointed at the departure from the MPL proposed by the applicant to 75mg/kg for all other FSMP. The level proposed that is far lower than any other FSMP approved level internationally and which may impact future imports and innovation.

Dietary exposure assessment

FSANZ conducted dietary exposure assessments to estimate the level of chronic exposure to steviol glycosides (expressed as steviol equivalents) from manufactured very low energy foods produced for consumption as part of a VLED, and for all other FSMP.

FSMP are intended to be consumed by limited population groups and consumers often rely on accessing FSMP from countries outside of Australia and New Zealand. It is not often the case that FSMP are used as a sole source of nutrition for a lifetime. The ADI is applied for a whole of life and is not based on a limited (temporary) exposure.

It is not clear why the scenario of 'Usual Use Levels' was not applied for the dietary exposure estimates since an estimate based on MPLs is highly conservative and is not likely to occur in reality.