



20 December 2023

Application A1247
Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
By email: submissions@foodstandards.gov.au

Dear A1247 Project Manager

Application A1247 – D-allulose as a novel food

Thank you for the opportunity to comment on FSANZ's call for submissions (CFS) on Application A1247 to permit the use of D-allulose as a novel food and for the enzyme used in its manufacture, D-allulose-3-epimerase, in the Australia New Zealand Food Standards Code.

This response is made in consultation with the the Australian Industry Group (Ai Group) Confectionery Sector.

About the Ai Group

The Australian Industry Group (Ai Group®) is a peak national employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for 150 years. Ai Group and partner organisations represent the interests of more than 60,000 businesses employing more than one million staff. Our membership includes businesses of all sizes, from large international companies operating in Australia and iconic Australian brands to family-run SMEs. Our members operate across a wide cross-section of the Australian economy and are linked to the broader economy through national and international supply chains.

About the Ai Group Confectionery Sector

The Ai Group represents the Australian and New Zealand confectionery industry through its Confectionery Sector, representing manufacturers of chocolate, sugar and gum confectionery; suppliers of ingredients, machinery, packaging materials and services to the industry, and wholesaler and distributor firms. We have over 100 confectionery sector members. Major confectionery manufacturing plants are principally located in New South Wales, Tasmania and Victoria, in a number of regional locations (eg Ballarat and Lithgow) and in South Australia, Western Australia, Queensland and New Zealand.

Comments

The Ai Group Confectionery Sector understands that FSANZ has assessed the application made by Samyang Corporation to amend the Australia New Zealand Food Standards Code to permit D-allulose manufactured by an enzymatic conversion of fructose to D-allulose using

Microbacterium foliorum SYG27B-MF containing D-psicose -3-epimerase and has prepared a draft food regulatory measure proposing that D-allulose be added to specified foods as a low-energy substitute for conventional sugar ingredients, particularly sucrose.

The Ai Group Confectionery Sector supports A1247 proceeding, based on FSANZ's assessment of the food technology aspects, safety, microbiological, nutritional impact and dietary exposure.

We are supportive of permitting the use of D-allulose in various food categories as proposed and recommend the permitted use of D-allulose, as a low energy substitute, be extended to other food classes, including chocolate and cocoa products. While it is for the Applicant's to determine the range of food groups to which D-allulose could be added, extending the permissions to use the ingredient in chocolate and cocoa products may offer increased benefits and avoid the need for a future, separate application.

The Ai Group Confectionery Sector is also supportive of permitting the enzyme processing aid, D-allulose-3-epimerase, based on FSANZ's safety assessment.

The proposed measures, if approved, present opportunity for consumers, industry and government. In particular, a new ingredient comes the opportunity to innovate product and offers consumers greater product choice; to industry through product diversification, new market opportunities and commercial benefit; and has the potential to help from a public health perspective by way of modifying dietary energy intake.

Notwithstanding the above, the Ai Group notes the variances in the proposed permitted levels for D-allulose between international jurisdictions and recommends that FSANZ consider harmonisation of domestic levels with those internationally, as much as possible, in the interest of trade.

Again, many thanks for the opportunity to share the Australian and New Zealand confectionery industry comments with regard to the A1247 CFS and our support of the application proceeding to permit D-allulose as a novel food. [REDACTED]

Yours sincerely

[REDACTED]