

# FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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7 February 2011

## SUBMISSION

Attention: **Project Manager – Application A1037**

Food Standards Australia New Zealand  
Box 7186,  
Canberra BC,  
ACT, Australia, 2610.

### **Re: Steviol Glycosides – Increase in Permitted Use Levels- Assessment Report**

FTA Australia has reviewed this [Application](#) and endorses the following comments of the Technical Sub Committee:

The Committee agreed with Option 2, to amend Standard 1.3.1 to allow an increase in the maximum permitted levels of Steviol Glycosides in the proposed foods, with a request that the following comments be considered during the assessment.

1. In the paragraphs headed “Executive Summary” and “Introduction” that following statement is presented: “The preparation that is the subject of this Application comprises 95% of nine steviol glycosides with Rebaudioside A accounting for over 95% of those present” (which is interpreted as meaning that this preparation has about 90% of Rebaudioside A).
2. Steviol Glycosides have to conform to Standard 1.3.4 – Identity and Purity and in fact are described and defined in the Monographs numbers 1.4 and 5 and in the proposed update stated in the Draft Variations attached to the Application and also in Proposal P1013 – Code Maintenance IX in paragraph 3.16, Issue 69 – i.e. JECFA Monograph No. 10.
3. The JECFA Monographs required a minimum of 95% purity without any restriction on the Rebaudioside A level.
4. It is suggested that any change in the levels in the proposed foods should be totally independent of the purity of the Steviol Glycosides, other than they should comply with the JECFA requirements.
5. The question is begged as to what is the relevance of this information to the Application. It also appears confusing as there is no explanation as to why it is even mentioned. There are apparently various Steviol Glycosides with different ratios of the glycosides that are compliant with JECFA but do not necessarily contain 95% of Rebaudioside A

6. In the 'Examples' shown in the Draft Variations, the second example (calculation of steviol equivalents for a mixture of glycosides) uses a Conversion Factor of 1.00 and this is considered incorrect and should be 0.40 as per the Table to clause 5(3).

If there are any queries regarding this submission, please contact the Technical Secretary, Tony Zipper, Telephone (03) 9532 8213, Fax (03) 9532 8213, Mobile 0409 324 075, E-mail [tzipper@dodo.com.au](mailto:tzipper@dodo.com.au).

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Application](#).

Yours sincerely,

Rob Richards  
PRESIDENT – FTA AUSTRALIA