



6 September 2013

Project Officer Application A1075
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036



Dear Sir/Madam

Application A1075 – Quillaia Extract as a Food Additive – Call for Submissions

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

MPI supports Option 1 to amend Standards 1.2.4 and 1.3.1 to allow the use of quillaia extract, as an emulsifier in specified beverages. We are satisfied that the proposed use of quillaia extract is technologically justified in beverages where flavourings and other oil-soluble substances are added, and that no public health or safety concerns were identified.

However, MPI questions in general whether more consideration can be given to identifying any further food categories where use of an additive is technologically justified when dealing with new additive permissions. This would ensure consistency across food categories and help avoid the need for further applications. Under the current application many categories of beverages are included, but some are not. For example, wine-based drinks, fruit wine products, brewed soft drinks, and mixed food beverages (category 20.1), all of which allow flavourings to be added. MPI appreciates that there may be limitations to increasing the scope of applications, including the availability of data, dietary exposure considerations, and the needs of the applicant.

MPI also questions whether it is necessary to specify 999(i) or 999(ii) for ingredient labelling purposes under Standard 1.2.4. Standard 1.2.4 does not otherwise require the detailed identification of additives using lower case roman numerals under the INS system and therefore it may be sufficient to use the food additive number 999 and the name *quillaia extract* in ingredient lists.

Yours sincerely



Manager Food Science and Risk Assessment