



TE MANA WHAKARITE KAI  
MO AHITEREIRIA ME AOTEAROA

## **INQUIRY REPORT**

**SUBJECT: P150 - A JOINT GENERAL STANDARD FOR FOOD ADDITIVES**

### **EXECUTIVE SUMMARY**

#### **Executive Summary from the Full Assessment Report**

The policy paper “The Regulation of Food Additives”, published in March 1996, was used as the basis for the development of a proposed draft Australia New Zealand General Standard on Food Additives. The proposed draft standard - P150 - was released for public comment from March 1997 to September 1997. A total of 65 submissions were received. The overwhelming majority of submissions supported the proposed draft standard, and comments received were related to:

- omissions from the schedules of additive uses currently permitted in Australia and/or New Zealand;
- inconsistencies in the permitted use of various additives; and
- requests for extensions to recognise established additive uses permitted by Codex or allowed in the EU or Northern America.

A small number of submissions raised concerns related to the general policy for the regulation of food additives being applied.

At full assessment a draft general standard for food additives was prepared which reinforced the consistent policy previously established by ANZFA for the use of the additives. The standard was developed by applying risk analysis to ensure that the dietary exposure to food additives from the food supply did not present an unacceptable risk to public health and safety and that consumers would not be exposed unnecessarily to high levels of food additives. Thereafter, it facilitated both consumer choice and innovation in food technology by applying the minimum restriction on use consistent with Good Manufacturing Practice (GMP) for those additives where dietary exposure estimates indicated no public health and safety concerns.

The safety of food additives was been assessed in accordance with the ANZFA policy paper “Framework for the assessment and management of food-related health risks”.

The DIAMOND system was used in accordance with the ANZFA draft policy paper “Dietary Modelling: principles and procedures” to assess potential dietary exposure to food additives and ensure that acceptable levels of consumption as defined, for example, by the acceptable daily intake (ADI), would not be exceeded.

It was proposed that the use of food additives be regulated by reference to the technological function being performed. This was consistent with the approach taken in the European Union directive on food additives and by the Codex Committee on Food Additives and Contaminants in developing the Codex general standard for food additives.

### **Summary of new submissions received**

Proposal P150 was released for a further round of public comment for six weeks initially between November and December 1998, which was consequently extended by three weeks to mid January 1999. 78 Submissions were received during the consultative period. The majority of submissions supported the proposed draft standard. No substantial new issues were raised. Issues raised in the submissions which resulted in changes to the draft standard addressed:

- omissions from schedule 1 of additive uses currently permitted in Australia and/or New Zealand;
- inconsistencies in the permitted uses of various additives;
- requests for extensions to recognise established additive uses permitted by Codex or allowed in the EU or Northern America;
- changes to category headings;
- changes to drafting; and
- including recognised New Zealand names of additives.

Refer to Attachment 3 for a detailed summary of the submissions received.

### **ASSESSMENT OF ISSUES RAISED IN PUBLIC SUBMISSIONS**

From the public submissions received at Inquiry, it has become increasingly evident that industry groups are having some difficulties understanding and interpreting the draft standard. In light of this, it is proposed that the Standard be accompanied by a package containing interpretation notes in guidelines.

Several submissions suggested variations to the formatting and presentation of the draft standard. These have been adapted where they improve comprehensibility of the Standard.

Many submissions made reference to the numerous commodity reviews that are being undertaken concurrently by the Authority. As the commodity reviews are being finalised, their recommendations are being incorporated into the draft standard. This has led, at times, to some inconsistencies between the draft standard, and other review proposals. However, any anomalies or inconsistencies will be identified and corrected as the review of the *Food Standards Code* proceeds. If necessary, final omnibus amendments will be made to the new Code to ensure consistency throughout the document.

Several submissions received also commented on previous decisions made by the Authority in relation to the use of food additives, but did not present any new data or arguments. As these issues have already been explored at length, they have not been revisited in this paper. Instead, they have been identified in the summary of submissions (refer to Attachment 3) as being dealt with in either the policy paper "The

Regulation of Food Additives”, published in March 1996, or in the full assessment report of Proposal P150.

Numerous requests for extensions of use for additives, in particular intense sweeteners, were received. Justification in some instances was supplied. The dietary modelling conducted, as summarised in the full assessment report, identified some ADI (Acceptable Daily Intake) concerns with certain additives. In the case where an extension of use could lead to dietary exposure exceeding the ADI, it was not considered to be appropriate to approve the extension of use. Where there were no public health and safety concerns, the extension of use has been recommended.

A significant number of submissions have queried how amendments to the Standard will be made. As mentioned above, commodity reviews are still be finalised, and hence changes to additive permissions and category names may be necessary. As these changes are recommended by other review proposals, they can be incorporated immediately into the food additive Standard.

The Authority recognises that a lead in time for the Joint Australia New Zealand Food Standards Code is necessary to ensure an ordered and workable transition period. Accordingly, implementation of the Joint Code envisages a period where both the Australian *Food Standards Code* and the New Zealand Food Regulations will run in parallel with, and as alternatives to, the new Code in Australia and New Zealand respectively. A transition period in the order of 18 months to two years is considered adequate for the food additive Standard.

It is anticipated that this Standard will be gazetted to take effect as soon as possible after Ministerial Council adoption.

## CHANGES TO FULL ASSESSMENT DRAFTING RESULTING FROM INQUIRY

### Recommended Changes to Full Assessment Drafting of Levels of Additives Permitted

Category	Additive	P150 Level	Recommended Level	Reason for change
0.1 Preparations of Food Additives	schedules 2, 3 and 4	none permitted	schedule 2 now permitted	Currently permitted in AFSC
0.1 Preparations of Food Additives	385 calcium disodium EDTA	not permitted	500 mg/kg	Currently permitted in AFSC; Submissions received highlighted a justification for this additive in this group of commodities
0.1 Preparations of Food Additives	sorbates, benzoates, parabens, sulphites, gallates, <i>tert</i> -BHQ, and BHA	were permitted in some categories within 0.1	now permitted in all 0.1 commodities	No public health and safety implications identified; simplifies standard; no reason for restrictions on additives
1.1.1 Liquid milk and liquid milk based drinks	additives in schedule 2	not permitted	GMP (in UHT goat milk only)	Submissions received highlighted a justification for these additives in this group of commodities
1.3 Condensed milk and evaporated milk	schedules 2, 3 and 4	none permitted	all permitted	Currently some permitted; Submissions received highlighted a justification for additives in schedule 2 in this group of commodities
1.4.1 Cream, reduced cream and light cream	additives in schedule 2	not permitted	GMP (in UHT goat milk only)	Submissions received highlighted a justification for these additives in this group of commodities
1.4.2 Cream products (flavoured, whipped, thickened, sour cream etc.)	234 nisin	permitted in clotted cream only 10mg/kg	10 mg/kg in all 1.4.2 products	Submissions received highlighted a justification for this additive in this group of commodities

1.5 Dried milk, milk powder, cream powder	431 polyoxy-ethylene (40) steareate 555 potassium aluminium silicate	not permitted	GMP	Submissions received highlighted a justification for these additives in this group of commodities
1.5 Dried milk, milk powder, cream powder	320 butylated hydroxy-anisole	1mg/kg	100mg/kg	Submissions highlighted this typing error
1.6 processed cheese	160b annatto extracts	600mg/kg	50mg/kg	Submissions received suggested that this level was unnecessarily high
1.6 processed cheese	220-228 sulphur dioxide and sulphites	300mg/kg	not permitted	Advice from commodity review team has indicated that sulphur dioxide is not required in these products; present due to carry-over
2 Edible oils and oil emulsions	160b annatto extracts 321 butylated hydroxy-toluene	10mg/kg not permitted	20mg/kg 100 mg/kg	Currently permitted in NZFR; consistent with international standards; Submissions received highlighted a justification for these additives in this group of commodities
2.1 olive oil	schedules 2, 3 and 4	none permitted	schedule 2 now permitted	Some currently permitted in AFSC
2.2.1.1 Butter	160a carotene 160b annatto extracts 508 potassium chloride	none permitted	GMP 20mg/kg GMP	Consistent with international standards; Submissions received highlighted a justification for this additives in this group of commodities
2.2.1.2 Butter products	schedules 2, 3 and 4	[new category]	all permitted	Industry requested additive permissions for butter products; some currently permitted in NZFR
2.2.2 Oil emulsions (<80% oil)	281 sodium propionate 282 calcium propionate	not permitted	GMP	Submissions received highlighted a justification for these additives in this group of commodities
3 Ice cream and edible ices	123 amaranth	not permitted	290mg/kg	Currently permitted in AFSC; Submissions received highlighted a justification for this additive in this group of commodities

4.1.2 Surface treated fruits and vegetables	914 oxidised poly-ethylene	not permitted	250 mg/kg citrus only	Currently permitted in AFSC; Submissions received highlighted a justification for this additive in this group of commodities
4.1.3 Peeled and/or cut fruits and vegetables	schedules 2, 3 and 4	none permitted	schedule 2 now permitted	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
4.1.3 Peeled and/or cut fruits and vegetables	300-303 ascorbic acid and ascorbates 315-316 erythorbic acid and sodium erythorbate	were expressly permitted at GMP	included in schedule 2	Express permission unnecessary as already permitted in Schedule 2 at GMP level
4.1.3 root and tuber vegetables	330-333 citric acid and citrates 380 ammonium citrates 450 pyro-phosphates 451 tri-phosphates 452 poly-phosphates 509 calcium chloride	were expressly permitted at GMP	included in schedule 2	Express permission unnecessary as already permitted in Schedule 2 at GMP level
4.3 Processed fruits and vegetables	220 sulphur dioxide	not permitted	20 mg/kg ginger only	Submissions received highlighted a justification for this additive in this group of commodities
4.3.1 Dried fruits and vegetables	1520 propylene glycol	GMP	included in schedule 2	Express permission unnecessary as already permitted in Schedule 2 at GMP level
4.3.4 Fruit and vegetable spreads	123 amaranth	not permitted	290mg/kg	Currently permitted in AFSC; Submissions received highlighted a justification for this additive in this group of commodities

4.3.4 Fruit and vegetable spreads	281 sodium propionate 282 calcium propionate	not permitted	GMP	Submissions received highlighted a justification for these additives in this group of commodities
5.1 Chocolate and cocoa products	schedules 2, 3 and 4	none permitted	schedule 2 now permitted	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
6.3 Processed cereal and meal products	160b annatto extracts	25mg/kg extruded and/or puffed breakfast cereals only	100 mg/kg extruded and/or puffed cereal products only	Submissions received highlighted a justification for this additive in cereal products other than just breakfast cereals, and at a higher level
6.4 Flour products	481 sodium lactylates 482 calcium lactylates	4000mg/kg	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives at a higher level in this group of commodities
7 Breads and bakery products	481 sodium lactylates 482 calcium lactylates	4000mg/kg	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives at a higher level in this group of commodities
7.1 Breads and related products	schedules 2, 3 and 4	none permitted (in plain breads)	all permitted	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
8.2 dried meat	200-203 sorbic acid and sodium, potassium and calcium sorbates	not permitted	1500mg/kg	Currently permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
8.3 Processed comminuted meat, poultry and game products	160b annatto extracts	not permitted	100mg/kg	Submissions received highlighted a justification for this additive in this group of commodities; (removed from edible casings)

8.3 fermented, uncooked processed comminuted meat products	235 pimaricin (natamycin)	GMP	1.2 mg/dm <sup>2</sup>	Submissions received highlighted a justification for review of the previous level of GMP
8.4 Edible casings	160b annatto extracts	20mg/kg	see 8.3 entry	see 8.3 entry
8.4 Edible casings	905a mineral oil, food grade	50g/kg		Mineral oil for this use is to be considered a processing aid; will be included in the review of processing aids
9.1 frozen fish	300-303 ascorbic acid and sodium, potassium and calcium ascorbates	400mg/kg	400mg/kg fillets only	Currently restricted in AFSC; Submissions received highlighted a justification for this restriction to remain
10.2 Liquid egg products	schedules 2, 3 and 4  234 nisin	none permitted	schedule 2 now permitted; GMP	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
10.3 Frozen eggs	schedules 2, 3 and 4	none permitted	schedule 2 now permitted; GMP	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
10.4 Dried and/or heat coagulated egg products	schedules 2, 3 and 4	none permitted	schedule 2 now permitted; GMP	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
10.4 Dried and/or heat coagulated egg products	1505 triethyl citrate	12500mg/kg liquid white only	not required; present due to carry over	Submissions received highlighted that this additive is only present due to carry over
11.1 rainbow sugar	schedules 2, 3 and 4	[new category]	all permitted	Industry requested additive permissions for rainbow sugar; currently permitted in NZFR
11.2 Sugars and syrups	220-228 Sulphur dioxide and sulphites	150mg/kg dried glucose syrup and corn syrup	not required; present due to carry-over	Submissions received highlighted that this additive is only present due to carry over



11.4 Tabletop sweeteners	640 glycine 641 L-leucine	not permitted	GMP	Currently permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
11.4.2 Tabletop sweeteners - tablets etc.	1521 polyethylene glycol 8000	GMP	included in schedule 2; express permission unnecessary	Submissions received highlighted the error
11.4.2 Tabletop sweeteners - tablets etc.	954 saccharin	not permitted	GMP	Currently permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
12.1.2 Reduced sodium salt mixture	270 lactic acid 296 malic acid 330 citric acid 355 adipic acid 508 potassium chloride	GMP	included in schedule 2; express permission unnecessary	Submissions received highlighted the error
12.1.3 Salt substitute	355 adipic acid 357 potassium adipate	GMP	included in schedule 2; express permission unnecessary	Submissions received highlighted the error
12.3 Vinegars and related products	schedules 2, 3 and 4	none permitted; permission for colours in schedule 3	schedules 2 and 4 not permitted	Submissions received highlighted a justification modification to wording
14.1.2 Fruit and vegetable juices and fruit and vegetable juice products	200-203 sorbic acid and sorbates 210-213 benzoic acid and benzoates 220-228 sulphur dioxide and sulphites 242 dimethyl dicarbonate	permitted in 14.1.2.1 only	now permitted in both 14.1.2.1 and 14.1.2.2 at same amounts	Currently permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities

14.1.2 Fruit and vegetable juices and fruit and vegetable juice products	281 sodium propionate 282 calcium propionate	not permitted	GMP	Submissions received highlighted a justification for these additives in this group of commodities
14.1.2.2 Fruit and vegetable juice products	1102 glucose oxidase	0.2mg/kg	included in schedule 2	Express permission unnecessary as already permitted in Schedule 2 at GMP level
14.1.5 Coffee, coffee substitutes etc.	schedules 2, 3 and 4	none permitted	schedule 2 now permitted	Currently some permitted in AFSC; Submissions received highlighted a justification for these additives in this group of commodities
14.2.1 Beer and related products	150 caramels	100mg/kg	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives in this group of commodities
14.2.1 Beer and related products	300-303 ascorbic acid and ascorbates 315-316 erythorbic acid and sodium erythorbate 405 propylene glycol alginate	40mg/kg  40mg/kg  100mg/kg	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives in this group of commodities
14.2.1 Beer and related products	flavourings	not permitted	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives in this group of commodities
14.2.4 cider and perry		schedules 2, 3 and 4	a specific positive listing of additives	Submissions received highlighted a justification for these additives in this group of commodities
14.2.5 Spirits and liqueurs	173 aluminium 174 silver 175 gold	not permitted	GMP	Currently permitted; Submissions received highlighted a justification for these additives in this group of commodities

20 dairy and fat based desserts, dips and snacks	481 sodium lactylates 482 calcium lactylates	4000mg/kg	GMP	Currently permitted in NZFR; Submissions received highlighted a justification for these additives at a higher level in this group of commodities
20 sauces and toppings, etc.	234 nisin  444 sucrose acetate isobutrate 445 glycerol esters of fatty acids 480 dioctyl sodium sulpho-succinate	not permitted	GMP  200mg/kg  100mg/kg  50mg/kg	Submissions received highlighted a justification for these additives in this group of commodities
20 sauces and toppings, etc.	281 sodium propionate 282 calcium propionate	not permitted	GMP	Submissions received highlighted a justification for these additives in this group of commodities

### Recommended Changes to Full Assessment Drafting to Category Headings

Category	Previous name	Recommended name	Reason for change
0.1	colours in aqueous solution	[subcategory deleted]	Additive permissions changed, leaving no need for this particular subcategory
0.1	culinary essences, extracts, flavourings and essential oils	[subcategory deleted]	Additive permissions changed, leaving no need for this particular subcategory
0.1	pectin and jam setting compounds	[subcategory deleted]	Additive permissions changed, leaving no need for this particular subcategory
1.1.2	Flavoured liquid milk and liquid milk based drinks	Liquid milk products and flavoured liquid milk	To aid in clarity of standard; submissions indicated that industry did not understand this category
1.2.2	Modified fermented milk and modified renneted milk	Fermented milk products and renneted milk products	To aid in clarity of standard; submissions indicated that industry did not understand this category
1.4.2	Modified cream products (flavoured, whipped, thickened, etc.)	Cream products (flavoured, whipped, thickened, sour cream etc.)	To aid in clarity of standard; submissions indicated that industry did not understand this category

1.4.2	clotted cream	[subcategory deleted]	Additive permissions changed, leaving no need for this particular subcategory
1.6	processed and reformed cheeses	[subcategory deleted]	Additive permissions changed, leaving no need for this particular subcategory
2	Edible fats and fat emulsions	Edible oils and oil emulsions	Review team for edible oils recommended this alteration
2.1	Edible fats essentially free of water	Edible oils essentially free of water	Review team for edible oils recommended this alteration
2.2	Fat emulsions (water in oil)	Oil emulsions (water in oil)	Review team for edible oils recommended this alteration
2.2.1	Fat emulsions (>80% oil)	Oil emulsions (>80% oil)	Review team for edible oils recommended this alteration
2.2.1.2	[new category]	Butter products	Industry requested additive permissions for butter products; this is best achieved by creating a new category
2.2.2	Fat emulsions (<80% oil)	Oil emulsions (<80% oil)	Review team for edible oils recommended this alteration
4.1.2	[new subcategory]	citrus fruit	Additive permissions altered; this is best reflected by creating a new category
4.3.6	marzipan and kernel paste	[subcategory deleted]	Additive permissions were duplicated; this subcategory is no longer required
4.3.8	jelly	subcategory moved	Industry indicated that category 4 was an inappropriate location for these products
5.1	Cocoa and chocolate products	Chocolate and cocoa products	Recommended category name better reflects products in this category
5.2	[new subcategory]	bubble gum and chewing gum	Creating a subcategory will aid in clarity and understanding
5.2	[new subcategory]	low joule chewing gum	Creating a subcategory will aid in clarity and understanding
7.1	plain breads	[subcategory deleted]	Industry indicated this subcategory was not necessary
8.3	dried meat	[subcategory deleted]	Industry indicated this subcategory was not necessary
11.1	[new subcategory]	rainbow sugar	Review team for sugar indicated this category was necessary
12.1.2	table salt	[subcategory deleted]	Industry indicated this subcategory was not necessary

20.1	Liquid foods	Beverages	Industry indicated a justification for clarity in this subcategory; this is best achieved by changing the name of the subcategory
20.2	Solid foods	Foods other than beverages	Industry indicated a justification for clarity in this subcategory; this is best achieved by changing the name of the subcategory
20.2	custard mix, custard powder and blanc mange powder	custard mix, custard powder, blanc mange powder and jelly	Industry indicated this was a more appropriate category for these products

### Recommended Changes to Full Assessment Drafting for Additive names

Previous name	Recommended name	Reason for proposed change
Azorubine	Azorubine / Carmoisine	New Zealand recognises alternative name

### Recommended Changes to Full Assessment Drafting, excluding schedules 1-5

Section	Previous wording	Recommended wording
Purpose	Processing aids are distinguished from food additives (see Standard 1.3.3) and vitamins and mineral added to food for nutritional purposes (see standard 1.3.2)	Food additives are distinguished from processing aids (see Standard 1.3.3) and vitamins and mineral added to food for nutritional purposes (see standard 1.3.2).
Purpose	A food additive may only be present in food where expressly permitted in this standard.	A food additive may only be added to food where expressly permitted in this standard.
Table of provisions	8 Food for use in manufacturing	8 Food for use in preparation of another food
Table of provisions; Schedule 4	Colours permitted to specified limits in processed foods specified in Schedule 1	Colours permitted to specified levels in processed foods specified in Schedule 1
Clause 1 Definitions	Maximum permitted limit	Maximum permitted level
Clause 1 Definitions	definition of bread and accompanying editorial note have been deleted	
Clause 3 Permitted use of additives	The additives listed in Schedules 1,2,3 and 4 may be added to a food or class of food to perform technological functions provided that:	The additives listed by name or number in Schedules 1,2,3 and 4 may be added to a food or class of food to perform technological functions provided that:

Clause 3 Permitted use of additives Editorial note	The use of a quality descriptor (eg natural, pure, traditional etc.) may further qualify the interpretation of GMP for a specific food by imposing further limitations on the use of additives in those products. When such quality descriptors are used, additives would generally not be permitted in accordance with clause 3(b) except where their use could be demonstrated to be essential or unavoidable in the preparation of the product.	The manner in which a food is intended to be presented (eg. by the use of such quality descriptors as natural, pure, traditional etc.) may affect the type and level of food additives that could be used in accordance with GMP. Similarly, the type and level of food additive used may affect the way in which a food may be presented.
Clause 4 Requirements for intense sweeteners	Save where otherwise expressly stated in Schedule 1 and not withstanding any specific limit specified in a Schedule to this Standard, intense sweeteners may only be added to food as a flavour enhancer, or in an amount necessary to replace the sweetness normally provided by sugars.	Save where otherwise expressly stated in Schedule 1 and not withstanding any specific limit specified in a Schedule to this Standard, intense sweeteners may only be added to food in an amount necessary to replace the sweetness normally provided by sugars or as a flavour enhancer.
Clause 5 (2) Maximum permitted levels of additives	cyclamate shall be calculated as cyclohexyl-sulphamic acid	cyclamate and its salts shall be calculated as cyclohexyl-sulphamic acid  saccharin and its calcium and sodium salts shall be calculated as saccharin
Clause 6 (2) Additives performing the same function	Example A food can have a maximum amount of 40 mg/kg of preservative X and 20 mg/kg of preservative Y.	Example A food can have a maximum amount of 40 mg/kg of preservative X or 20 mg/kg of preservative Y.
Clause 8	Food for use in manufacturing  A food intended for use in the manufacture of another food may contain any or all of the additives in a quantity permitted in the final food.	Food for use in preparation of another food  A food intended for use in the preparation of another food may contain any or all of the additives in a quantity permitted in the final food.

## **SCIENTIFIC ASSESSMENT**

In the P150 Full Assessment report, dietary exposure assessments were undertaken on 175 additives (69 groups of additives) with an acceptable daily intake (ADI). Additives with no ADI were assessed as being of no risk to human health on the basis that the ADI was 'not specified'. Of the 69 additive groups, 40 additive groups were assessed as being of no risk assuming the exclusive use of the additive in foods at maximum permitted levels (MPLs). Information was requested from the food industry on the actual use in the food supply of the remaining 29 additive groups. Based on this information, only 5 additive groups (sulphites, nitrites, cyclamates, saccharin and propylene glycol) were considered as potential causes for concern because potential dietary exposure exceeded the reference health standard (ADI). The Authority proposed risk management options for these additive groups, including the restriction of permissions for use.

The dietary exposure assessments presented in the P150 Full Assessment Report were derived from the 1983/1985 National Dietary Survey (NDS) data because more recent data from the 1995 National Nutrition Survey (NNS) were not available at the time of assessment. The Authority has now repeated dietary exposure assessments of the 29 additive groups of initial concern based on the 1995 NNS data, using the same assumptions about additive levels as in previous assessments. These results are presented in Attachment 4.

### **Summary of results**

In general, the decisions made by the Authority based on the 1983/85 survey data are validated by the revised dietary exposure assessments. However, estimated dietary exposures for additives used predominantly in soft drinks have tended to increase because the level of consumption and number of consumers of soft drinks have increased in the period from 1983 to 1995. Estimated dietary exposures for intense sweeteners have tended to decrease because unlike the 1983/85 NDS, the 1995 NNS data distinguishes between low joule and normal counterpart foods, such that models estimating dietary exposure to intense sweeteners include consumers of low joule foods only. These estimates are therefore more realistic and in most cases reflect the results reported in the Authority's 1994 survey on intense sweetener consumption (NFA 1995). Detailed results are in Table 1 of Attachment 4.

### **Monitoring program**

In a limited number of cases, the level of concern about the potential risk of the dietary exposure to an additive or additive group is such that the Authority intends to establish an ongoing monitoring program to assess the impact of proposed changes to the additive food standard on the food supply, on estimated dietary exposure and risk to human health. Refer to Attachment 4.

## **CONCLUSIONS**

As concluded at the full assessment; a general standard for food additives has been prepared as a result of the inquiry. This standard was based on the proposed draft standard circulated by the Authority in March 1997.

The standard had been prepared to be consistent with ANZFA's previously published policies on:

"The Regulation of Food Additives";

"Framework for the assessment and management of food-related health risks";  
and

"Dietary modelling: principles and procedures".

This outcome is the most effective means of achieving the aim of ensuring that the intake of food additives from the food supply does not present a risk to public health and safety. This outcome also means that consumers are not exposed unnecessarily to high levels of food additives, while facilitating both the consumers' desire to exercise choice, and innovation in food technology, by applying the minimum restriction on use consistent with GMP.

The changes made since Full Assessment enhance the achievement of this objective.

### **Attachments:**

1. Proposed Joint Draft Standard for Food Additives
2. Statement of Reasons (single document available upon request)
3. Public Comment Received
4. Dietary Assessment (additional documents available upon request)