

HEALTH PROTECTION DIRECTORATE

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1030 – Calcium lignosulphonate (40-65) as a food additive

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1030.

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies and includes expert input by Queensland Health Forensic and Scientific Services.

It is noted on page 9 of the AR, “FSANZ concludes that an analytical method to determine the presence (or to quantify the amount) of the substance in the final food is neither appropriate nor necessary”.

Queensland considers it is never inappropriate to have an analytical method for a food additive available.

If the permission is the use of calcium lignosulphonate (40-65) as a food additive, then an analytical method for calcium lignosulphonate (40-65) is highly appropriate and necessary.

Accordingly, we would appreciate if an analytical method can be determined in light of national discussion agreeing that it is important that the system must allow for analytical methodology to be resolved prior to a standard being implemented.

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We also note on page 4 of the AR under 2.3 International permissions that it does not appear any other country has actually approved the use of this additive.

Yours sincerely

Gary Bielby
Principal Environmental Health Officer
Food Safety Policy and Regulation Unit
Environmental Health Branch