

SUBMISSION FOR APPLICATION A1034 – Advantame as a high intensity sweetener (2nd Assessment)

**Food Policy and Programs Branch, SA Health
15 March 2011**

Thank you for the opportunity to provide comments to the 2nd Assessment Report for A1034. SA Health supports **Option 2A** – approve the use of Advantame as an intense sweetener in Schedule 1 of Standard 1.3.1. Comments are provided below.

Reasons for Preferred Option

FSANZ has nominated Option 2B as their preferred option – to allow the use of Advantame in a broad range of products – rather than in a restricted group of products as specified in the application. SA Health is concerned that there is no evidence to support the suitability of Advantame in other food matrices and no methods of analysis for determining the levels of Advantame in these other foods.

It is not considered appropriate to develop a Standard where enforcement would be difficult due to issues with the validity of analytical methods. Full consideration of this issue on a product by product basis is therefore recommended.

Trade marking

SA Health would also like to seek confirmation on the status of Advantame as a trademark. Advantame is listed as a trademarked name for the chemical preparation however the information on the applicant's website states that it is a generic name for the sweetener, not a registered brand name. This issue needs clarification.

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