

10 August 2016

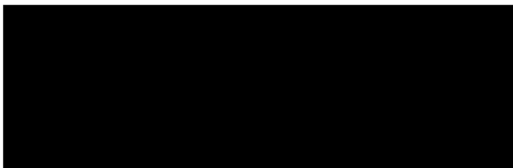
Project Manager
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
NEW ZEALAND

Email: submissions@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1117: Extension of Use of L-Cysteine as a Food Additive.***

Yours sincerely



Katherine Rich
Chief Executive



***Call for submissions – Application A1117:
Extension of Use of L-Cysteine as a Food
Additive***

**Submission by the New Zealand Food & Grocery
Council**

10 August 2016

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1117: Extension of Use of L-Cysteine as a Food Additive.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

OVERARCHING COMMENTS

3. NZFGC supports the Application to extend a currently permitted food additive, L-cysteine monohydrochloride (an amino acid, L-cysteine), to treat peeled and/or cut avocados and bananas. As with an existing permission for vegetables, the use is to control enzymatic browning and so extend the shelf life of avocados and bananas.
4. NZFGC notes that no evidence of adverse effects has been found at levels that L-cysteine has been used as a supplement. As a result FSANZ’s risk assessment concluded that there were no public health and safety concerns associated with the proposed use.
5. NZFGC supports a parallel permission to the current permission for peeled, cut or both peeled and cut vegetables, that is, for L-cysteine monohydrochloride to be used as a food additive to treat avocados and bananas at Good Manufacturing Practice (GMP) levels.
6. In relation to labelling, the class name ‘antioxidant’ already exists and is proposed to apply in this case and the prescribed food additive name ‘L-cysteine monohydrochloride’ and the code number ‘920’ are also already available in the Food Standards Code. While NZFGC recognises the technical accuracy of the naming convention for the full name, ‘L-cysteine monohydrochloride’, we consider it is of no relevance to the consumer whether the salt is named or not – the full term is entirely consumer unfriendly and is unnecessarily technical for an ingredients list. We support the full term ‘L-cysteine monohydrochloride’ in the permission for use in section S15—5 but we recommend the root term ‘L-cysteine’ be listed in Standard 1.2.4, section 7.

SPECIFIC COMMENTS

The Application

7. This Application seeks to extend a currently permitted food additive, L-cysteine monohydrochloride (an amino acid, L-cysteine), to treat peeled and/or cut avocados and bananas to control enzymatic browning and so extend their shelf life. L-cysteine is already a permitted food additive in several areas in the Australia New Zealand Food Standards Code (infant formula, follow-on formula, sports foods and for root and tuber vegetables (peeled, cut or both peeled and cut)). It is also approved as a processing aid as a dough conditioner. There is no permission for it as a food additive for peeled, cut or both peeled and cut fruits

Risk assessment

8. NZFGC notes that FSANZ found no evidence of adverse effects reported at levels that L-cysteine has been used as a supplement. FSANZ's risk assessment concluded that there were no public health and safety concerns associated with the proposed extension of use of the food additive for the proposed purpose.

The Permission

9. The permission is proposed to parallel the current permission for peeled, cut or both peeled and cut vegetables, that is, for L-cysteine monohydrochloride to be used as a food additive to treat avocados and bananas at Good Manufacturing Practice (GMP) levels. This provision will be in a newly created sub-category, in Schedule 15—5 called 4.1.3.3 (Avocados and bananas).

Labelling

10. FSANZ is proposing that class name 'antioxidant' be used for L-cysteine monohydrochloride, with either the prescribed food additive name 'L-cysteine monohydrochloride' or the code number '920'. These are already available in the Food Standards Code and no additional labelling provisions are required.
11. While NZFGC recognises the technical accuracy of the naming convention for the full name, 'L-cysteine monohydrochloride', we consider it is of no relevance to the consumer whether the salt is named or not – the full term is entirely consumer unfriendly and is unnecessarily technical for an ingredients list. We support the full term 'L-cysteine monohydrochloride' in the permission for use in section S15—5 but we recommend the term 'L-cysteine' be listed in Standard 1.2.4, section 7.