



17 October 2018

Food Standards Australian New Zealand

PO Box 5423

Kingston ACT 2604

AUSTRALIA

By Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Dear Sir / Madam,

**Re. Application A1149 Addition of steviol glycosides to fruit drinks**

FrucoR Suntory Ltd. is an Australasian manufacturer of non-alcoholic beverages with a brand portfolio that includes leading brands of waters, fruit juices, fruit drinks, energy drinks, sports drinks, sports waters, soft drinks and organic kombucha.

Our personnel are active members of the New Zealand Beverage Council (NZBC), the Australian Beverage Council Ltd (ABCL), New Zealand Food and Grocery Council (NZFGC), New Zealand Nutrition Foundation and the NZ Fruit & Vegetable Alliance (NZ FAVA) by providing executive and technical expertise on several working groups within these organisations.

FrucoR Suntory looks to take a lead role within the beverage sector via new product development (NPD), with new strategies that support a commitment to providing healthier options for consumers. We are quietly getting on with reformulating more of our product range to reduce sugar without affecting the taste. On-going innovation across our beverage portfolio includes the offering of specific lower sugar/zero sugar drinks, smaller pack sizes (smaller volume bottles), and functionality.

As a member of the ABCL, we will be working on the ABCL Sugar Reduction Pledge in which the non-alcoholic beverage industry has committed to a 20 percent reduction in sugar across the industry's portfolio by 2025. The non-alcoholic beverage sector requires a level of agility and flexibility to enable ongoing innovation and to provide consumers with a wide choice of quality low and no sugar beverages.

Frucor Suntory Ltd welcomes the opportunity to make a submission in response to Application A1149, which seeks to permit the addition of steviol glycosides to fruit drinks at a maximum permitted level of 200 mg/kg steviol equivalents in the Australia New Zealand Food Standards Code.

We **fully support** Application A1149, noting FSANZ's conclusion that the use of steviol glycosides as an intense sweetener in fruit drinks is technologically justified and there is no public health and safety concerns from the extension at the proposed level. This provision is necessary for greater innovation within the category.

We thank FSANZ for the opportunity to provide feedback on Application A1149.

Kind regards,



**Frucor Suntory Ltd**

10 Orb Avenue, Manukau 2104, Auckland, New Zealand

PO Box 76202, Manukau 2241

[frucorsuntory.com](http://frucorsuntory.com)