

**Comments from Victorian Departments of Economic Development, Jobs, Transport and Resources, and Health and Human Services**

**Due date of submission – 31 August 2018**

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to provide comments on Application A1157 – Enzymatic production of Rebaudioside M.

Application A1157 proposes to amend Schedule 3 of the *Australia New Zealand Food Standards Code* (the Code) to allow the use of Blue California's Rebaudioside M in accordance with the Code's existing permissions and limits for Rebaudioside M.

From the FSANZ assessment report it is understood that:

- The Applicant, Blue California, seeks to add Rebaudioside M, produced using a novel production method, to Schedule 3 of the Code to permit its use as a food additive.
- Rebaudioside M is a steviol glycoside; a group of substances permitted as intense sweeteners (food additives) for addition to a variety of foods.
- Internationally, steviol glycosides are approved for use in the European Union, Canada, Asia, Central/South America, and Africa.
- A novel, multi-step enzymatic process using uridine diphosphate UDP-glucosyltransferase and sucrose synthase is applied to manufacture Blue California's Rebaudioside M.
- The enzymes are sourced from genetically modified strains of *Pichia pastoris*, a yeast. FSANZ has recommended that permission for use of these enzymes as processing aids also be expressly included in the Code.
- FSANZ's risk assessment has concluded that there are no safety risks either from the use of Blue California's Rebaudioside M as a food additive or the enzymes used in the manufacturing process.

On the basis of this understanding, the departments support the progression of the Application A1157.