



March 26, 2019

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
Australia

Food Standards Australia New Zealand
PO Box 10559
The Terrace WELLINGTON 6143
New Zealand

Re: Call for submissions – Application A1172 - Enzymatic production of Rebaudioside D

Dear Sir or Madam,

The Calorie Control Council (CCC) is responding to calls for submissions to assist with the consideration of the draft food regulatory measure regarding application A1172, Enzymatic production of Rebaudioside D (Reb D), as submitted by SweeGen, Inc. (SweeGen). CCC is an international association of manufacturers and end users of low-, no-, and reduced calorie ingredients, foods and beverages, including steviol glycosides.

CCC supports the draft food regulatory measure to amend the Australia New Zealand Food Standards (FSANZ) Code (the Code) to include a new specification for rebaudioside D (Reb D) produced by an enzymatic conversion method. CCC supports the FSANZ risk assessment conclusions, which confirm that neither SweeGen's Reb D nor the enzymes used to manufacture Reb D pose a public health or safety risk. CCC also supports the conclusion that the use of the enzymes in the manufacture of the Reb D in the manner proposed by SweeGen (i.e., as a processing aid) is technologically justified.

CCC supports the FSANZ draft variation to amend Schedule 3 to include a reference to the production method for SweeGen's Reb D in the specifications for steviol glycosides and the amendment to Schedule 18 to permit the use of the enzyme as a processing aid in the manufacturing of Reb D.

CCC appreciates the opportunity to comment on this draft food regulatory measure and welcomes any questions you may have.

Respectfully submitted,

Calorie Control Council
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