

Comments from the Victorian Department of Health and Human Services and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 26 March 2019

The Victorian Departments of Health and Human Services and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1172 - Enzymatic production of rebaudioside D proposes to amend Standard 1.3.1 to allow the use of SweeGen's Rebaudioside D manufactured by a new process through enzymatic bioconversion of stevia leaf extract.

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- Rebaudioside D is a steviol glycoside that has application as a high-intensity sweetener for addition to low-calorie foods.
- Steviol glycosides, including rebaudioside D, extracted from stevia leaves are already permitted for use as a food additive in the Code.
- Internationally, steviol glycosides are permitted to be used as food additives 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 SweeGen's Rebaudioside D.
- The enzymes are sourced from a genetically modified strain of *Pichia pastoris*, a yeast. FSANZ has recommended that permission for use of these enzymes as processing aids for production of rebaudioside D be expressly included in the Code.
- FSANZ's risk assessment has concluded that there are no safety risks either from the use of SweeGen's rebaudioside D as a food additive or the enzymes used in the manufacturing process.

On the basis of the information above, the departments support the progression of Application A1172.