



17 September 2020

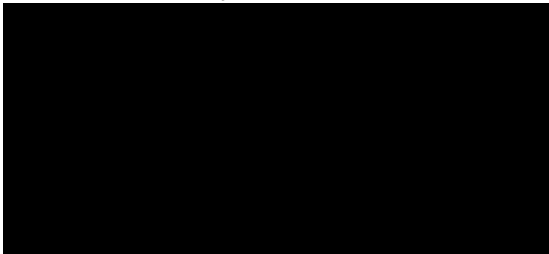
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for Submissions – Application A1180: Natural Glycolipids as a preservative in non-alcoholic beverages*.

Yours sincerely



Chief Executive



***Call for Submissions – Application A1180:
Natural Glycolipids as a preservative in
non-alcoholic beverages***

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

17 September 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1180: Natural Glycolipids as a preservative in non-alcoholic beverages*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

THE APPLICATION

3. The application from LANXESS Deutschland GmbH seeks an amendment to the Australia New Zealand Food Standards Code (the Food Standards Code) to permit the use of long-chain glycolipids from *Dacryopinax spathularia* (“Natural Glycolipids”) as a preservative in non-alcoholic beverages at use levels ranging from 10-100 mg/kg. Natural Glycolipids is a natural glycolipid mixture resulting from fermentation of glucose by an edible jelly fungus. These are alternatives to heat treatment and the like for preservation.

COMMENTS

4. NZFGC supports the amendment being sought on the basis that the risk assessments conducted by FSANZ did not identify safety or other concerns with consumption of the additive.

Risk Assessment

5. FSANZ undertook a risk assessment covering food technology, microbiological, safety and dietary exposure assessments. The food technology assessment determined use of the proposed food additive in the quantity and form proposed for preservation was technologically justified. The microbiological assessment concluded that use was effective as a preservative against yeasts and moulds in non-alcoholic beverages but at different levels for different beverages. This explains why the applicant is proposing a schedule of use as:
 - 100 mg/kg for fruit and vegetable juices/products and non-alcoholic beer
 - 50 mg/kg for water-based flavoured drinks
 - 20 mg/kg for formulated beverages
 - 10 mg/kg for coffee, coffee substitutes, tea, herbal infusions and similar products.
6. The safety assessment, following analysis of pharmacokinetic data, short-term repeat dose Good Laboratory Practice-compliant studies, toxicity data and the absence of chronic or carcinogenicity studies or human tolerance studies, resulted in FSANZ estimating an ADI of 2.0mg/kg of body weight per day. The dietary exposure assessment concluded that at expected use rates and consumption patterns, the ADI would not be reached and dietary exposures would be similar to those estimated for consumers in the USA which formed part of the US GRAS notification in 2017.
7. NZFGC is aware that when this application was submitted to FSANZ in May 2019, applications were in preparation for submission to the EU and to Canada. It would be useful for FSANZ to cross-check the dietary exposure assessments for those jurisdictions to be assured that there is commonality in the estimated ADI and dietary exposures of the assessment. This would add to the surety that the calculations applied and the studies drawn on have not been supplemented or changed in the intervening period.

Risk Management

8. FSANZ has drafted an amendment to the Food Standards Code but has not agreed with the applicant that the descriptor “Natural Glycolipids” should be used in the ingredients list. Instead, FSANZ proposes “jelly mushroom glycolipids” on the basis that this is one of four names listed in the US GRAS notification for the food additive for labelling in the US. The food additive is derived from jelly mushroom fungus and so the term “jelly mushroom glycolipids” is more descriptive for the consumer.

Cost benefit

9. NZFGC considers the opportunity to expand the alternatives for preservatives for manufacturers to select from is a positive move where those additives are safe for consumption.

Conclusion

10. As noted at the outset, NZFGC supports amendment to the Food Standards Code on the basis that the risk assessments conducted by FSANZ did not identify safety or other concerns with consumption of the additive and that providing wider choices for manufacturers to select the most effective preservative for their products is an important part of sustaining variety in the food supply.