

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

**Due date of submission – 22 July 2021**

The Victorian Departments of Health 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 A1222 – *Steviol glycosides from Yarrowia lipolytica* seeks to permit the use of a steviol glycoside mixture produced by fermentation of simple sugars using a genetically modified (GM) strain of *Yarrowia lipolytica* (*Y. lipolytica*). The applicant is Avansya V.O.F. (Avansya).

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

- Steviol glycosides have applications as intense sweeteners or flavour enhancers and are permitted in the Code for addition to a variety of foods. Currently, Avansya's rebaudioside MD preparation is not permitted in the Code.
- Avansya's rebaudioside preparation is a mixture of rebaudioside M with lesser amounts of rebaudioside D. It may also contain minor amounts of other steviol glycosides.
- A GM yeast strain, *Y. lipolytica* VRM0014, contains novel genes from *Stevia rebaudiana* Bertoni and is used in steviol glycoside biosynthesis.
- The production strain, *Y. lipolytica* VRM0014, is a non-pathogenic microorganism and has a long history of safe use in food production.
- Products manufactured using the rebaudioside MD preparation from GM *Y. lipolytica* VRM0014 that either list it as an ingredient, or contain novel protein or DNA, will be subject to the GM labelling requirements under the Code.
- Internationally, steviol glycosides are permitted to be used as food additives in the European Union, Canada, South and North Asia, Asia Pacific, United States of America, Central/South America, the Middle East, and Africa.
- Avansya's rebaudioside MD preparation has GRAS (Generally Recognised as Safe) status for variety of food and beverage uses in the USA.
- FSANZ's risk assessment has concluded that there are no safety risks from either the use of Avansya's rebaudioside MD preparation produced by GM *Y. lipolytica* VRM0014 as a food additive, or the production strain used in the manufacturing process.

It is our understanding that a food labelling requirement will be applied to the rebaudioside MD preparation as a food additive in the statement of ingredients. The Codex Alimentarius Commission has adopted an International Numbering System (INS) to distinguish steviol glycosides produced from the plants and other methods. We note that at this stage INS listing is being finalised for steviol glycosides produced by different methods of production.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with the use of Avansya's rebaudioside MD preparation as a food additive, the departments support the progression of Application A1222.