



25 November 2020



**Submission for Application A1207: Rebaudioside M as a Steviol Glycoside from *Saccharomyces cerevisiae***

Dear Sir/Madam,

We thank you for the call for submissions for Application A1207: Rebaudioside M as a Steviol Glycoside from *Saccharomyces cerevisiae*.

Health Food Systems Australia (HFSA) is an advocacy group dedicated to promoting a food system that is healthy and sustainable for both people and the planet, through holistic and systemic policy actions.

**Our vision** is for a food system that promotes public and planetary health, and is healthy, sustainable, and equitable for all Australians. We believe that this transformation can only occur with a coordinated shift at all levels of the supply chain, including the broader, interconnected elements of the food system. We want to see national food policy that is holistic in its aims and is underpinned by a systemic view of the food system. We believe public health action should avoid siloed, reductionist interventions as they are less effective in isolation, and instead be synergistic in its coverage.

**Our values** are that public and planetary health are mutually beneficial, and do not exist in isolation from wider political, environmental, economic, technological, and social conditions. We value a resilient food system that is less industrialised and input-intensive, and subsequently produces foods that are minimally processed and requires fewer environmental resources. We value a system that caters to the rights of the people and the planet and is not vulnerable to the power of highly concentrated markets.

**Our mission** is to advocate for better health and environmental outcomes through policy that is evidence-based, holistic in its vision, and not profit-driven. We are committed to advocating for people and planetary health-focused national policy that does not prioritise industry interests over public interest.

We oppose the approval of application A1207 for the reasons outline below:

- The FSANZ's literature review conducted relied heavily on unpublished, industry supplied data from previous applications. This demonstrates a clear conflict of interest, given that industry supplied data is more likely to present favourable findings for industry. This should be considered both when weighing up the evidence for harm of the additive, but also of the benefit of the application
- We query whether using industrial methods of extraction and formulation of Reb M warrants a change in the labelling of this additive from 'natural' to 'artificial' – maintaining a 'natural' status for this additive seems misleading for consumers when trying to make considered consumption choices

- We note that FSANZ has stated in its risk assessment that “some information relevant to this section is Confidential Commercial Information (CCI), so full details cannot be provided in this public report.” It would be beneficial to identify where in the risk assessment this has occurred, so that stakeholders can better review the documentation and provide opinions and advice on the application
- We would ask FSANZ for clarity in regard to updating the INS numbering so that consumers may identify steviol glycosides derived from different sources, in accordance with The Codex Alimentarius Code.
- In addition, the potential impact that increased NNS consumption may have on taste preferences was not assessed by FSANZ. When sweetened food is consumed routinely, especially earlier in life, this flavour profile becomes familiar and acceptable, and ultimately can inform preferences for sweetened food. Overstimulation of sweet taste receptors may limit tolerance for more complex, less sweet tastes, such as fruits and vegetables.
- There is a concern that consumers may exceed the ADI for steviol glycosides. FSANZ has stated that assuming an average body weight of 70 kg, a person would need to consume 1400 g/day of water-based beverages before exceeding the ADI for stevia. While consumption of 1.4L of a single type of water based beverage a day may be unlikely, the increasing adoption of stevia in many beverages (including dairy drinks, fruit juice and energy drinks) and commonly consumed products (including, yoghurts, confectionary and ice-cream) may increase the risk of consumers exceeding the ADI. For children, who need to consume only 830 g/day to exceed these limits, this is even more concerning.
- The consumption data used in FSANZ’s dietary exposure assessments were collected almost a decade prior. Evidence shows that intakes of NNS, and levels in the food supply, have increased over the last two decades globally. Therefore, more recent dietary exposure assessment data are needed to increase confidence in the risk assessment procedures.
- The scope of public health investigated during FSANZ’s risk assessment process was confined predominantly to toxicological considerations. The potential substitution of ultra-processed foods that have been reformulated with stevia for whole foods was not considered in this process, nor was the direct or indirect impacts on environmental sustainability. Another public health nutrition issue not addressed by FSANZ in their risk assessment is the potential for manufacturers to receive higher Health Star Ratings for their products when using NNS as a substitute for sugar. NNS are not penalised in the current nutrient profiling criteria used to inform these ratings. Increasing NNS permissions in the food supply, and the subsequent promotion of these products as healthy, could legitimise increased intakes of UPF, and is an issue that warrants investigation and consideration moving forward

Warm regards,

Healthy Food Systems Australia