



FSANZ

submissions@foodstandards.gov.au

20th December 2023

Re: Submission to Application A1247 – D-allulose as a novel food

For 30 years the New Zealand Beverage Council has represented New Zealand's non-alcoholic beverage sector.

Our members represent over 75 percent of the non-alcoholic ready-to-drink beverages sold at retail level in New Zealand and comprise the brand owners, manufacturers, bottlers and suppliers of New Zealand's juice, carbonated drinks, flavoured-dairy and bottled water brands.

Our membership is made up of a wide range of companies operating in New Zealand – from some of the largest multinational brands in the world through to some the country's smallest boutique producers, as well as those companies that provide a wide range of goods and services to those companies.

With regards to A1247 above, we wish to support the submission made by the Australian Beverage Council, as we share their views about specific aspects of the proposal.

1. Exclude low energy sugars, such as D-tagatose, from 'added sugars' given their low energy value and how the body processes low energy sugars.
2. Exclude carry-over ingredients from 'added sugars' given the amount of sugar is inconsequential in the final product.
3. Separate honey, malt, malt extracts, concentrated fruit juice and deionised fruit juice from sugars which are sugar, as opposed to sugars from products that contain sugar.
4. Proposal P1062 be conducted in parallel with Proposal P1058.

Thank you for the opportunity to be involved and we are very keen to continue to work on these proposed changes as they are significant for our members and the New Zealand consumers.

Yours sincerely

