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Electronic Submission to:
Food Standards Australia New Zealand (FSANZ)
Standards Development
Documents for Public Comment
standards.management@foodstandards.gov.au.

Re: Application A1034
Advantame as a High-Intensity Sweetener
2nd Assessment Report

The Calorie Control Council (the “Council”) is an international association representing companies that make and use intense sweeteners. The Council appreciates the opportunity to comment on the second assessment report for Application A1034 for the use of Advantame as a high-intensity sweetener. The Council supports the use of Advantame as a Schedule 2 food additive in Standard 1.3.1 for use according to Good Manufacturing Practice (GMP) in foods specified in Schedule 1.

The Council is pleased to see that by proposing to approve the use of advantame FSANZ understands the need for the availability of a variety of low-calorie sweeteners. The development and approval of a variety of low-calorie sweeteners provides industry the opportunity to meet the ever-growing consumer demand for light products. By having a variety of alternative sweeteners from which to choose, manufacturers can use the ingredient, or combination of ingredients, best suited for a given product. This is known as the multiple sweetener approach to calorie control.

A variety of approved sweeteners is essential because no sweetener is perfect for all uses. The advantages of the multiple sweetener approach have long been known. Sweeteners vary not only in sweetness intensity but also in mouthfeel, onset and duration of sweetness, perceived aftertaste, solubility and stability at various levels of pH and temperature. The availability of a variety of sweeteners is important because no sweetener, including sucrose, is perfect for all uses. But with several available, each sweetener can be used in the applications for which it is best suited and manufacturers can overcome limitations of individual sweeteners by using them in blends. Blends can provide improved taste, solubility, stability and extended shelf life.

Also, when combined/blended most sweeteners have a synergistic effect. Because of the synergistic effect when using sweetener blends, less total sweetener is usually required. Also since the sweeteners used do not chemically react with one another and the individual sweeteners do not break down into unknown or unsafe ingredients, the use of sweeteners in combination assures manufacturers and consumers of continued safe new product and taste choices.

Also the taste profile of sweeteners varies. The sweet taste of some is perceived immediately while that of others is delayed. The duration of sweetness can also vary. Chewing gum is a good example for the use of multiple sweeteners. By combining, for example, three or more sweeteners you would incorporate the benefits of all to have an immediate onset, long lasting, tapering off sweetness.

Again, the Council appreciates the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lyn O'Brien Nabors". The signature is fluid and cursive, with the first name "Lyn" being more prominent.

Lyn O'Brien Nabors
President