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File Ref: QCHO/006214

6 September 2013

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – A1075 Quillaia Extract as a Food Additive

Thank you for the opportunity to provide a submission on the call for submissions regarding A1075 quillaia extract as a food additive.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from other relevant Queensland Government agencies. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Legislative and Governance Forum on Food Regulation.

The Applicant proposes the analytical method cited in the JECFA specification, "with amendments to improve sensitivity". No details are given of what these amendments are. However, it is noted that the JECFA method is for assay of the strength of straight quillaia extracts, which contain tens of thousands of parts per million (ppm) of saponins (typically 30,000, depending on the type of extract used). The method uses standard solutions containing about 13,500 ppm of saponins. Saponins are detected and quantified by UV detection at 220 nm, which is a "generic" detection wavelength prone to interference. This is borne out in the sample chromatograms given in the method, which even under these relatively ideal conditions (a semi-pure product at high concentration) show relatively strong extraneous peaks not far from the peaks of interest. The foods to be assayed are to contain not more than 40 ppm of saponins, which is several orders of magnitude lower than the concentrations of saponins in the extracts that the JECFA method is designed for.

Even with modifications it is difficult to see how the JECFA method could be successfully applied to food products in the proposed permitted concentration range because it is likely the saponin peaks in the chromatogram would be swamped by interfering substances. As such, there will be analytical difficulties identifying and quantifying the concentration in food. Due to these analytical challenges, it may not be possible for enforcement officers to effectively monitor and enforce the proposed variations to the Food Standards Code.

It is noted that the Call for Submissions Report and the Risk and Technical Assessment Report do not include any information on whether there is evidence that quillaia extract at the proposed

maximum permitted levels could cause allergic or other adverse reactions in some individuals. As a result, it is not clear if FSANZ has considered whether an amendment of Standard 1.2.3 *Mandatory Warnings and Advisory Statements and Declarations* is required or not.

In regard to future applications and proposals to permit new foods or substances, FSANZ should include in their normal assessment process whether there may be possible allergic or other adverse reactions in some individuals. If sensitivities are identified, then consideration should be given to whether amendment of Standard 1.2.3 *Mandatory Warnings and Advisory Statements and Declarations* is required if the food or substances were to be permitted in the Food Standards Code.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

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