AUSTRALIAN FOOD & GROCERY COUNCIL

AFGC SUBMISSION

FSANZ APPLICATION – *A1129*

MONK FRUIT EXTRACT AS A FOOD ADDITIVE

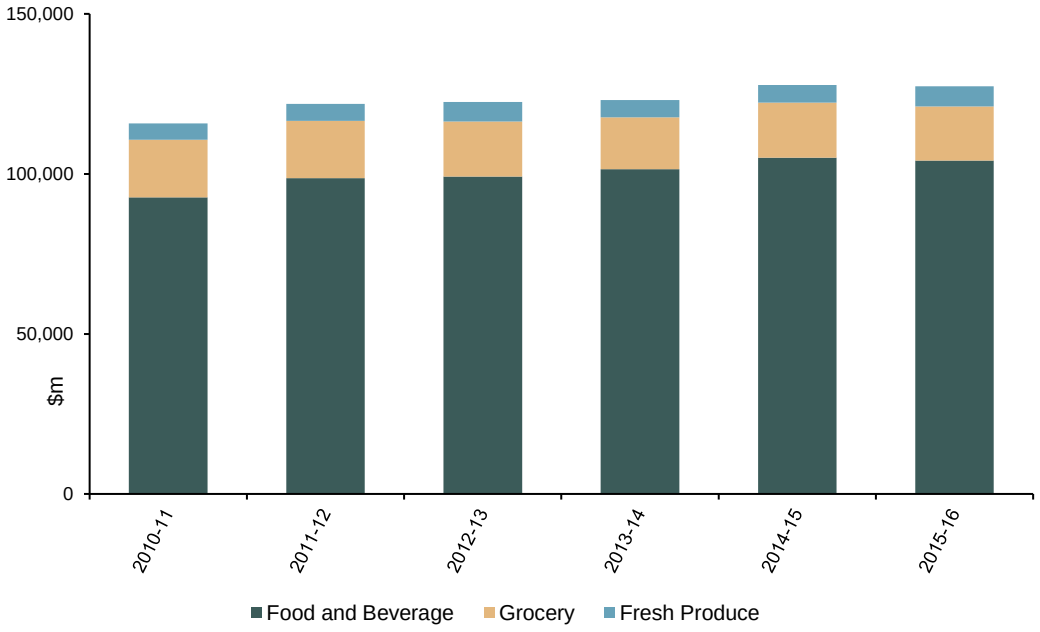
Sustaining Australia

1. PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 180 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

*Figure 3.1: Composition of the defined industry's turnover ($2015-16) (*million*)*



With an annual turnover in the 2015-16 financial year of $127.4 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector is Australia's largest manufacturing industry. Representing 32.4 per cent of total manufacturing turnover in Australia.

The diverse and sustainable industry is made up of over 30,748 businesses and accounts for over $67.9 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made $2.9 billion in capital investment in 2015-16 on research and development.

The food and grocery manufacturing sector employs more than 320,300 Australians, representing about 2.6 per cent of all employed people in Australia, paying around $17.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 40 per cent of the total persons employed being in rural and regional Australia. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

2. SUBMISSION

The Australian Food and Grocery Council (AFGC) provides this submission in response the Food Standards Australia New Zealand (FSANZ) *Application Paper – A1129: Monk Fruit Extract as a Food Additive - to permit monk fruit extract as a food additive, specifically as an intense sweetener.*

The AFGC has reviewed the Supporting Document 1 – *Risk and Technical Assessment Report* – Application A1129 prepared by FSANZ and supports the positions expressed therein.

Monk fruit extract is derived from the fruit of *Siraitia grosvenorii*, a perennial vine native to southern China. The sweet chemical components of monk fruit extract are cucurbitane triterpene glycosides collectively known as mogrosides. The predominant component of commercial monk fruit extracts is mogroside V, which typically represents 30 to 40% of the extract.

The AFGC acknowledges that monk fruit itself has been used whole or in a dried powdered form in beverages and traditional medicines in China and Japan for many centuries. In addition, monk fruit extract-containing food products are currently permitted in many overseas countries, including Canada and the United States since 2007.

Given the current pressures the Australian and New Zealand marketplaces are experiencing with respect to public health policies specifically targeted to reducing obesity rates in the community, the permission to use sweeteners including monk fruit extracts as non-nutritive, low kilojoule substitutes to sugars such as sucrose, provides exciting opportunities for the development of innovative alternatives to traditionally used sweeteners in the domestic food and beverage industry. This recognition and support of innovation within the industry will provide ongoing benefits to public health and significantly value-add to the Australian and New Zealand economies.

The AFGC recognises and supports that the technological justification for the use of monk fruit extracts as an intense sweetener is its potential use as a sugar substitute in baking applications due to its high temperature stability and its significant lack of bitter aftertaste compared with other sweeteners including, saccharin, aspartame and acesulfame K.

In addition, monk fruit extract exhibits a significantly different sensory profile compared with other intense sweeteners, including a honey/liquorice flavour and odour, perhaps providing a more palatable choice of sweeteners compared with those currently available on the market.

The AFGC notes that FSANZ cites that there is no evidence from human studies that reports any adverse health effects or risk to public health in relation to the consumption of monk fruit or monk fruit extract. Based on the currently available toxicological data, the AFGC supports the FSANZ position that in the absence of any identifiable hazard, an Acceptable Daily Intake (ADI) 'not specified' is appropriate for monk fruit extract and that a dietary exposure assessment is therefore not required.

The AFGC also acknowledges and supports the position presented in the Coca-Cola South Pacific submission, in that within the previous five years there has been approximately 300 monk fruit extract products launched globally, including a significant proportion within the beverage industry. Given that monk fruit extracts have a long history of safe use in many countries as a food additive, it would therefore be reasonable to assume that domestic manufacturers would be commercially disadvantaged if access to monk fruit extracts were not permitted.

The AFGC compliments FSANZ on the comprehensive work performed in relation to the evaluation and assessment of monk fruit extract and strongly supports an amendment to the Australia New Zealand Food Standards Code (the Code) to permit monk fruit extract, an intense sweetener, to be used as a food additive.