



31 August 2018

Food Standards Australia New Zealand
PO Box 5423 KINGSTON ACT 2604

Attention: Standards Management Officer

RE: Submission – A1129 – Monk Fruit Extract as a Food Additive (20 July 2018) [54-18]

The a2 Milk Company™ (a2MC) support the review and update of the Australia New Zealand Food Standards Code (the Code) in order to reflect the current status of additive use in Australia, and to support international trade through recognition of food additives in use in other markets.

The a2 Milk Company™ appreciate the opportunity to make a submission to this consultation.

Overall Position

The a2 Milk Company™ supports the FSANZ recommendation to amend the table to section S15—5 to permit the use of the use of monk fruit extract as a food additive to perform the technological purpose of an intense sweetener.

Request to Extend Scope of Approval

The a2 Milk Company™ request that the scope of permissions is extended to include approval for the use of monk fruit extract as a food additive to the following food groups.

Justification for the request

a2MC is requesting extension of the scope for permissions for Luo Han Guo for the same reasons as the applicant:

- Sugar substitute which lacks the bitter taste of alternative products
- Heat stability, and
- Plant based derivative.

Technological purpose of the food additive

The technological purpose performed by Luo Han Guo as a food additive will be as an intense sweetener – a purpose which is listed in Schedule 14 of the Code.

Food groups requested

The additional food group names and numbers requested are set out in the following table and align with those defined in Schedule 15 – substances that may be used as food additives.

The proposed level of Luo Han Guo for each food group requested is also provided.

Food Group Name and Number	Maximum Luo Han Guo extract concentration (mg/kg)
1.1.2 Liquid milk products and flavoured liquid milk	2,500
1.2.2 Fermented milk products and renneted milk products	2,500
13.3 Formulated meal replacements and formulated supplementary foods	3,500
13.4 Formulated supplementary sports foods	3,500

Percentage of the market likely to use Luo Han Guo extract

The estimated percentages provided in the following table are aligned with “Method B” (all other food groups) used by the Applicant (Saraya) in predicting the market share likely to be gained by Luo Han Guo extract in Australia and New Zealand.

Food Group Name and Number	Percentage of the food group in which the food additive is proposed to be used
1.1.2 Liquid milk products and flavoured liquid milk	3%
1.2.2 Fermented milk products and renneted milk products	3%
13.3 Formulated meal replacements and formulated supplementary foods	3%
13.4 Formulated supplementary sports foods	3%



a2MC note that FSANZ has concluded:

FSANZ's risk assessment concluded that there were no public health and safety issues associated with the proposed use of the food additive as an intense sweetener. The assessment also concluded that its use as an intense sweetener was technologically justified; and

in the absence of any identifiable hazard, FSANZ concluded that an acceptable daily intake (ADI) 'not specified' is appropriate. A dietary exposure assessment is therefore not required.

Thank you for the opportunity to provide this input to FSANZ. If you require any further information, please do not hesitate to contact me.

Yours sincerely

