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RESPONSE TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON THE DRAFT FOOD (AMENDMENT NO. X) REGULATIONS 2020

The Singapore Food Agency (SFA) initiated a public consultation on the draft Food (Amendment No. X) Regulations 2020 for the period 13 April 2020 to 12 June 2020. Concurrently, trading partners and interested parties were notified via World Trade Organisation (WTO) notifications G/SPS/N/SGP/64 and G/TBT/N/SGP/53 (7 April to 7 June 2020).

Feedback was sought from stakeholders (industry associations, local food manufacturers and importers), as well as trading partners and interested parties, on views and comments regarding the proposed amendments.

At the close of the public consultation exercise and WTO notification period, SFA received 8 responses: 3 of which expressed support for the proposed amendments, with no further comments. The comments and feedback from the remaining 5 submissions are summarised below.

(A) Comments on proposed provisions for the use of new food additives

1. A foreign government requested for Singapore's safety assessment for the 3 new types of steviol glycosides[1], and for soy leghemoglobin derived from genetically modified *Pichia pastoris*. In response, SFA explained that Singapore takes reference from assessments conducted by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), where available, in our food additive assessments. This was the case for the 3 new types of steviol glycosides. In the case of soy leghemoglobin derived from genetically modified *Pichia pastoris*, SFA had reviewed evidence published in reputable scientific journals which support the safety of soy leghemoglobin when used in food, as well as conducted a dietary exposure assessment and found that the amount of soy leghemoglobin used in meat analogues would not exceed the Acceptable Daily Intake (ADI), and that the average intake of heme iron from the approved use of soy leghemoglobin would be within the levels of naturally-

[1] The 3 new types of steviol glycosides are:
(a) Rebaudioside A from multiple gene donors expressed in *Yarrowia lipolytica*
(b) Rebaudioside M produced by enzymatic modification of Rebaudioside A extracted from stevia leaf, using the enzymes UDP-glucosyltransferase (EC 2.4.1.17) and sucrose synthase (EC 2.4.1.13), produced by genetically modified strains of *Escherichia coli* K-12 W311
(c) Rebaudioside M produced by enzymatic conversion of purified stevia leaf extract, using the enzymes UDP-glucosyltransferase (EC 2.4.1.17) and sucrose synthase (EC 2.4.1.13), produced by genetically modified strains of *Pichia pastoris*

occurring heme iron in meat. In addition, SFA had consulted local experts, who, based on the available data and intended application and level of use, did not find additional safety concerns related to the toxicity and allergenicity of soy leghemoglobin when consumed in a normal balanced diet.

2. An industry member suggested to adopt a generic name for 2 of the 3 new steviol glycosides which were produced by enzymatic modification. SFA informed the industry member that the Codex Alimentarius Commission has not endorsed such a practice and that listing the specific steviol glycosides produced by enzymatic modification is similar to the practice in major developed countries such as Australia and New Zealand.

3. Another industry member sought clarification on the provisions for ferrous bisglycinate, lutein esters from *Tagetes erecta* (INS 161b(iii)), and soy leghemoglobin derived from genetically modified *Pichia pastoris*. SFA informed the industry member that ferrous bisglycinate will be allowed as a source of dietary iron in infant formula and foods for infants and young children and that INS 161b(iii) will be allowed for use as a colouring matter in food under good manufacturing practice. With regard to soy leghemoglobin derived from genetically modified *Pichia pastoris*, SFA informed the industry member that since the additive performs more than one technological function (flavour enhancer and colouring matter) in meat analogues, it will be allowed as a general purpose food additive in such products, up to a level of 0.45% (w/w).

(B) <u>Comments on proposed deletion of Regulation 204(2) specifying the geographical origin of Scotch whisky</u>

An industry association and a foreign mission requested for Regulation 204(2) to be retained in the Food Regulations to confer geographical indication (GI) protection for Scotch whisky and to better protect consumers from counterfeit products.

SFA has responded that protection of geographical indications is not within the scope of the Sale of Food Act nor the Food Regulations, and that removal of Regulation 204(2), which is particular to Scotch whisky, will not impact the GI protection already conferred to Scotch whisky as a registered GI under the Geographical Indications Act 2014.

Given that there is sufficient and more appropriate legislation to address GI matters, Regulation 204(2) can be deleted from the Food Regulations. Nonetheless, matters related to food safety continue to be regulated by SFA under the Sale of Food Act and the Food Regulations, which are independent of the deletion of Regulation 204(2). Like all other food products, Scotch whisky sold in

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Singapore will be required to comply with the food safety requirements of the Food Regulations.

SFA appreciates the time taken by all parties to submit feedback and comments on the draft Food (Amendment No. X) Regulations 2020. We would like to encourage all parties to actively participate in future calls for comments.

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