

RESPONSE TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON THE DRAFT FOOD (AMENDMENT) REGULATIONS 2019

The Agri-Food and Veterinary Authority of Singapore (AVA) initiated a public consultation on the draft Food (Amendment) Regulations 2019 from 6 September 2018 to 5 November 2018. Concurrently, trading partners and interested parties were notified via WTO notifications G/SPS/N/SGP/61 and G/TBT/N/SGP/45 (18 September to 17 November 2018).

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

At the close of the public consultation exercise and WTO notification period, AVA has received 6 responses: 5 from the industry and 1 from a foreign government. One industry member expressed support for the proposed amendments to the Food Regulations, with no further comments. The comments and feedback from the remaining 5 submissions are summarised below.

Industry members voiced support for the inclusion of new food additives into the Food Regulations, such as new enzymes and new sweetening agent (monk fruit extract). One industry member requested AVA to increase the limit for ash content of monk fruit extract from 2% (w/w) to 5% (w/w), to be in line with the limit for ash content specified in the United States Food Chemical Codex, which was also adopted by Canada, Australia and New Zealand. This would facilitate trade as monk fruit extracts commercially traded in the United States and the other major developed countries would then be allowed for use in Singapore. AVA has assessed and concluded that the company's request can be acceded to.

A foreign government requested for the scientific rationale for the proposed maximum limits for copper in various edible fats and oils as it was of the view that the Codex Alimentarius Commission (CAC) has not established limits for copper in fats and oils. AVA clarified that the CAC has adopted maximum limits for copper in the *Standard for Named Vegetable Oils* (CODEX STAN 210-1999), *Standard for Olive Oils and Olive Pomace Oils* (CODEX STAN 33-1981), *Standard for Named Animal Fats* (CODEX STAN 211-1999) and *Standard for Edible Fats and Oils Not Covered by Individual Standards* (CODEX STAN 19-1981). Singapore's proposed maximum limits for copper in various edible fats and oil are in line with the Codex's maximum limits.

An industry member commented that some varieties of the non-ready-to-eat oats would not be able to meet the criteria for the health claim for oat beta-glucan, in view of the naturally high saturated fat content in these products. AVA clarified that the nutrient criteria is based on the ready-to-eat food, when prepared in accordance to the directions of use indicated on the product label.

AVA appreciates the time taken by all parties to submit feedback and comments on the draft Food (Amendment) Regulations 2019. We would encourage all parties to actively participate in future calls for comments.

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