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RESPONSES TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON DRAFT FOOD (AMENDMENT) REGULATIONS 2024 (FOOD ADDITIVES AND INGREDIENTS)

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The Singapore Food Agency (SFA) initiated a public consultation on the Draft Food (Amendment) Regulations 2024 mainly to extend the use of permitted food additives and allow the use of new ingredients in infant formula, from 31 January 2024 to 31 March 2024. Concurrently, trading partners and interested parties were notified via World Trade Organisation (WTO) SPS notification G/SPS/N/SGP/85 during the same period.

At the close of the public consultation exercise and WTO notification period, SFA received comments from nine respondents. SFA's responses are tabulated in **Table 1**.

SFA appreciates the time taken by stakeholders to submit feedback and comments which would contribute to the decision-making process. The amendments are targeted to come into effect by end June 2024. We would like to encourage all parties to actively participate in future consultations.

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TABLE 1

(Comments received from nine respondents in total)

A. Comments on extending the use of sucralose to soybean-based beverage	**SFA's response**
1. One respondent enquired if sucralose could be discontinued in all drinks or beverages due to its possible adverse health effects.	In Singapore, food additives such as sweetening agents (including sucralose), must be assessed for safety before they can be used in food. When assessing the safety of food additives, SFA takes reference from studies published by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), which is an international scientific expert panel that advises the Food and Agriculture Organisation (FAO) and the World Health Organisation (WHO). The safety of sucralose has been evaluated by JECFA, and the use of sucralose in various foods has been endorsed by the international food standards setting body, the Codex Alimentarius Commission. SFA has also conducted our own risk assessment, taking into consideration our local consumption pattern of sucralose. We have assessed that the overall intake from all food categories where sucralose is allowed to be added, including this latest addition to soya bean beverages, will not introduce additional safety risks. In addition, SFA also has in place a food sampling and testing programme to ensure compliance with these regulations. We will continue to keep abreast of the latest developments and revise the regulations for food additives, if necessary, to ensure food safety.
B. Comments on steviol glycosides	**SFA's response**

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2. Three respondents expressed support for the proposed amendments to the Food Regulations to adopt the JECFA steviol glycosides 3. Two respondents commented that consumption of food products containing steviol glycosides may lead to adverse health effects	SFA thanks these respondents and we look forward to their active participation in future consultation exercises. In Singapore, food additives such as sweetening agents (including steviol glycosides), must be assessed for safety before they can be used in food. When assessing the safety of food additives, SFA takes reference from studies published by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), which is an international scientific expert panel that advises the Food and Agriculture Organisation (FAO) and the World Health Organisation (WHO). The safety of various forms of steviol glycosides has been evaluated by JECFA several times since 2007, and the use of steviol glycosides in various foods has been endorsed by the international food standards setting body, the Codex Alimentarius Commission, since 2011. SFA has also conducted our own risk assessment, taking into consideration our local consumption pattern of steviol glycosides. We have assessed that the overall intake from all food categories where steviol glycosides is allowed to be added will not introduce additional safety risks. In addition, SFA also has in place a food sampling and testing programme to ensure compliance with these regulations. We will continue to keep abreast of the latest developments and revise the regulations for food additives, if necessary, to ensure food safety.
C. Comments on infant formula	**SFA's response**

4. One respondent expressed support to the proposed amendments to allow new ingredients in infant formula as well as the maximum levels of permitted ingredients in infant formula 5. Two respondents expressed concerns over the proposed amendments to new ingredients in infant formula as well as the maximum levels of permitted ingredients in infant formula. One respondent further suggested that there should be more studies conducted on the Asian population before allowing the proposed amendments on infant formula	SFA expresses gratitude for their participation and we look forward to their active participation in future consultation exercises. SFA would like to clarify that our policy position for the addition of ingredients to infant formula is "to provide substances ordinarily found in human milk and to ensure that the formulation is suitable as the sole source of nutrition for the infant or to provide other benefits that are similar to outcomes of populations of breastfed babies" (Regulation 252(6) of the Food Regulations). In relation to this, you may wish to note that the following ingredients that are intended for use in infant formula are all naturally present in human breast milk. The commercial forms of the above ingredients for addition to infant formula are chemically identical to those that are naturally present in human breast milk. • 2'-fucosyllactose (2'-FL), Lactose-N-tetraose (LNT), 3'-sialyllactose (3'-SL), 6'-sialyllactose (6'-SL) and 3-fucosyllactose (3-FL) We mentioned in the consultation document that major developed countries such as Australia, New Zealand, the European Union and the United States have allowed one or more of the above ingredients to be used in infant formula. This may have led to the misunderstanding that safety data is only available from Western countries. We would like to clarify that peer reviewed scientific literature on the safety of these ingredients, using data from Asian populations in Singapore and China are available. SFA has assessed

	that the proposed levels of the ingredients for addition to infant formula are within the naturally occurring levels found in human breast milk and will not pose safety concerns to the target group of consumers, based on the reviews of the toxicity, dietary exposure and metabolism of the ingredients.