



23 Dec 2019

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for submissions – Application A1182: Glucose Oxidase from a GM Trichoderma reesei as a processing aid (enzyme)*.

Yours sincerely

Katherine Rich
Chief Executive



***Call for submissions – Application A1182:
Glucose Oxidase from Trichoderma reesei
as a processing aid (enzyme).***

**Submission by the New Zealand Food & Grocery
Council**

23 Dec 2019

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1182: Glucose Oxidase from a GM Trichoderma reesei as a processing aid (enzyme)*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

The Application

3. AB Enzymes GmbH has applied to amend Schedule 18 – Processing Aids in the Australia New Zealand Food Standards Code (the Food Standards Code) to add a glucose oxidase enzyme preparation from *Trichoderma reesei* (*T. reesei*). The main use of the processing aid is for cereal-based products (baking such as bread, biscuits, tortillas, cakes and croissants and other cereal-based processes such as for pasta, noodles and snacks) and egg processing.

COMMENTS

4. NZFGC strongly supports the expansion of processing aids for baking and egg processing. The current Application is for a new microbial source for an already approved enzyme processing aid.
5. Glucose oxidase has been used in the food industry in baking and other cereal based processes for over 20 years. Some of their uses have been approved for years in the likes of Denmark and France. The enzyme sourced from *T. reesei* has been approved in the US (Generally Recognised as Safe), Mexico, Canada, Denmark and the EU (including France).
6. Similarly, *T. reesei* has been the base for the production of several enzymes already approved for use in food processing in New Zealand and Australia such as cellulase, endo-1,4-beta-xylanase, beta-glucanase, hemicellulase multicomponent enzyme and polygalacturonase as well as for several processing aids for specific technological purposes eg aspergillopepsin, lipase, triacylglycerol and lysophospholipase, The most recent approval was made in September 2019 for aAspergillopepsin sourced from a GM derived *T reesei*.
7. Of the around 170 enzymes approved in the Food Standards Code as Processing Aids, around 5% involve *T. reesei*.
8. Risk Assessment – FSANZ conducted a risk assessment and found, as previously, that *T. reesei* is neither toxigenic nor pathogenic. It is absent in the final enzyme preparation proposed to be added to the Food Standards Code.
9. Glucose oxidase made from *T. reesei* is non-genotoxic *in vitro* and toxicity studies did not generate any observed adverse effects. FSANZ therefore concluded there were no public health or safety concerns associated with Glucose oxidase made from *T. reesei* and that an acceptable daily intake (ADI) of ‘not specified’ was appropriate.

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10. In relation to labelling, there is a generic exemption from listing processing aids in the statement of ingredients and this will apply to glucose oxidase from *T. reesei*.
 11. As with previous applications, NZFGC supports choice in the options available to manufacturers for ingredients and for processing aids. There are a wide range of enzymes available for baking and for egg processing and the addition of another is beneficial to the industry looking for specific technical functions in processing.
 12. NZFGC supports the inclusion of glucose oxidase enzyme preparation from *T. reesei* to the Schedule 18 in the Food Standards code.