



27 July 2020

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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 A1194: Glucoamylase from GM Trichoderma reesei as a PA (enzyme)*.

Yours sincerely

Katherine Rich  
**Chief Executive**



***Call for submissions: Application A1194:  
Glucoamylase from GM Trichoderma  
reesei as a PA (enzyme)***

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

**27 July 2020**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1194: Glucoamylase from GM Trichoderma reesei as a PA (enzyme)*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

### COMMENTS

3. This Application continues the stream of applications from companies for enzymatic processing aids over recent years derived from *Trichoderma reesei* (*T. reesei*) in some form. All have been assessed as safe and included in the Australia New Zealand Food Standards Code.
4. The function of glucoamylase is to convert starch to glucose. Glucose is a widely used ingredient in the manufacture of syrups, beverages, cereal-based products, and fruit and vegetable products. The processing aid being considered is for use in brewing, the manufacture of bakery products, the production of potable alcohol and starch processing.
5. FSANZ addressed health and safety concerns in its risk assessment noting that:
  - Glucoamylase produced using *T. reesei* has a history of safe use in many countries and this particular product is approved for use in Denmark, France and the USA. It should be noted that within the EU only Denmark and France require safety evaluations for enzymes used as processing aids before they can be used in food production
  - The production strain, *T. reesei*, is non-toxic and non-pathogenic and has been shown to be non-genotoxic
  - The final enzyme product is purified so that *T. reesei* is no longer present
  - In any case, *T. reesei* is a commonly used production strain for enzymes which are, as noted at the outset of this submission, already approved for use in the Food Standards Code. Glucoamylase from other sources has been used in food production for several decades
  - Glucose syrup used during fermentation may be sourced from wheat on occasion but it is highly unlikely that any wheat protein would be present in the final product due to the extensive processing of the product. FSANZ considers that if it is present in the final food it would be at less than 5ppb. Even so, because of the low usage of enzymes and the alcohol distillation process, wheat proteins would not be carried over into the distillate. This would remove the need for allergen labelling. By comparison, while the Food Standards Code exempts alcohol distilled from wheat from the requirement to declare wheat, a wheat declaration would be required if wheat protein was present in other brewed beverages such as brewed soft drinks.
6. In light of the risk assessment, and noting that one more glucoamylase on the market provides industry with more choice, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit glucoamylase from GM *T. reesei* to be used in the Australian and New Zealand food supply

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7. We would like to think that in the future, the assessment and approval process for enzymes and other processing aids might be streamlined so as to reduce the need for repetitive assessment of very similar products.